

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

3
4 _____
5 SUPRIYA KHAZANIE,

6 Plaintiff,

7 v.

Civil Action

8 UNIVERSITY OF NORTH CAROLINA AT

No.

9 CHAPEL HILL, UNC GILLINGS

1:20-CV-1096

10 SCHOOL OF GLOBAL PUBLIC HEALTH,

11 KATIE THORNSVARD, in her

12 individual and official capacity

13 as Associate Dean for Finance

14 and Business,

15 Defendants.
16 _____

17 VIDEOCONFERENCE DEPOSITION OF

18 SUPRIYA KHAZANIE

19 DATE: Friday, February 17, 2023

20 TIME: 10:10 a.m.

21 LOCATION: Remote Proceeding

22 Durham, NC 27705

23 REPORTED BY: Joshua Seagondollar, Notary Public

24 JOB NO.: 5697605
25

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF SUPRIYA KHAZANIE:

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ON BEHALF OF DEFENDANTS UNIVERSITY OF NORTH CAROLINA
AT CHAPEL HILL, UNC GILLINGS SCHOOL OF GLOBAL PUBLIC
HEALTH, AND KATIE THORNSVARD IN HER INDIVIDUAL AND
OFFICIAL CAPACITY AS ASSOCIATE DEAN FOR FINANCE AND
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A P P E A R A N C E S (Cont'd)

ALSO PRESENT:

Kristen Simonsen-Lewis, In-House Defense Counsel
(by videoconference)

Anne Martin, In-House Defense Counsel (by
videoconference)

Steve Degaetano, Paralegal (by videoconference)

Jeremy Lindsley, Defense Team (by
videoconference)

Mary Stewart Wilson, Law Student (by
videoconference)

Anne Privett, Paralegal (by videoconference)

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P R O C E E D I N G S

THE REPORTER: Good morning. My name is Joshua Seagondollar; I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 10:10 a.m.

This is the deposition of Supriya Khazanie taken in the matter of Supriya Khazanie vs. University of North Carolina at Chapel Hill, UNC Gillings School of Health and Global Public Health, and Katie Thornsvarð, in her individual and official capacity as the Associate Dean for Finance and Business taken on February 17, 2023, at 536 East Lenoir Street, Raleigh, North Carolina 27601.

I am a notary authorized to take acknowledgments and administer oaths in the state of North Carolina. Parties agree that I will swear in the witness remotely outside of her presence.

Additionally, absent objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording virtually of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same

1 manner as a deposition recorded by
2 stenographic means; and
3 - shall constitute written stipulation
4 of such.

5 At this time will everyone in
6 attendance please identify yourself for the record

7 MS. JOHNSON: Kari Johnson on behalf of
8 the defendants in this case.

9 MS. BATEMAN: Valerie Bateman on behalf
10 of the plaintiff in this case.

11 MS. MARTIN: Ann Martin on behalf of
12 defendant in this case.

13 MS. LEWIS: Kristen Lewis, an attorney
14 with the defendants, joined by Mary Stewart Wilson, a
15 law student in my office, and also Anne Privett, a
16 paralegal in the office.

17 MS. JOHNSON: And we are also joined at
18 DOJ with Steve Degaetano --

19 MR. DEGAETANO: Degaetano.

20 MS. JOHNSON: Degaetano. I'm terrible
21 with names. And also Jeremy Lindsley.

22 MR. LINDSLEY: Thanks, Kari.

23 MS. JOHNSON: Sorry. I think I said
24 your name right.

25 MR. LINDSLEY: You did. Thank you.

1 MS. JOHNSON: Steve will get mad at me
2 later for butchering him.

3 THE REPORTER: All right.
4 Ms. Khazanie, could you please introduce yourself for
5 the record?

6 MS. KHAZANIE: Supriya Khazanie,
7 plaintiff.

8 THE REPORTER: Thank you. Hearing no
9 objection, I will now swear in the witness.

10 Ms. Khazanie, please raise your right
11 hand.

12 WHEREUPON,

13 SUPRIYA KHAZANIE,
14 called as a witness, and having been first duly sworn
15 to tell the truth, the whole truth, and nothing but
16 the truth, was examined and testified as follows:

17 THE REPORTER: Lastly, can you please
18 state your full name spelled out including the middle
19 name, if any, and your current complete address,
20 please?

21 THE WITNESS: Supriya Prabhaker
22 Khazanie, S-U-P-R-I-Y-A. Prabhaker is
23 P-R-A-B-H-A-K-E-R. And the last name's Khazanie,
24 K-H-A-Z-A-N-I-E. Address is 536 East Lenoir Street,
25 Raleigh, North Carolina 27601.

1 THE REPORTER: Thank you. One moment.
2 Counsel, you may proceed.

3 EXAMINATION

4 BY MS. JOHNSON:

5 Q Ms. Khazanie, we've been talking before the
6 deposition mainly just about the logistics that are
7 going on today with this remote deposition and some of
8 the issues that we're having. But I wanted to
9 officially introduce myself and you've already heard
10 the names of the people that are here today on behalf
11 of the defendants.

12 But my name is Kari Johnson and I will be
13 the attorney asking you questions today. Have you
14 ever been deposed before?

15 A No.

16 Q So basically, as you can see, I'll be asking
17 questions; you'll be answering them under
18 oath -- obligated -- truth. The court
19 reporter -- somewhere out there in -- land and
20 he -- everything that you say down in a
21 transcript -- virtual connectivity interruption -- in
22 some format.

23 And then -- the deposition, he's going to
24 type it up into a transcript and then that will be
25 what we use for further purposes in this case.

1 And I think he's already indicated for that
2 reason you need to -- we both need to make sure that I
3 get all of my questions out before you start your
4 answers and we both need to try to be as clear as
5 possible so that the transcript can be complete. We
6 would ask that if you don't understand any of my
7 questions -- complete and accurate.

8 If you don't understand any of my questions,
9 please just say "could you rephrase that" or "I don't
10 understand." I know that there are going to be times
11 where I'm not asking a clear question, so please make
12 sure you understand the questions to the best of your
13 ability before you try to answer them.

14 We are going to be going for -- I've got a
15 lot of material to go over today; this is my one
16 chance to ask you questions and meet with you like
17 this. So you know, I'll apologize in advance that
18 this is going to take several hours.

19 I typically like to take a very short break
20 at least once an hour, a restroom break. And then if
21 at any other time you need any other breaks, please
22 just say so and we'll be happy to take a break.

23 At some point in time if we do get close to
24 a lunch hour and people -- which we probably
25 will -- and if people -- we can just discuss as we go

1 whether or not people need to take a short break for
2 lunch.

3 But I know it's a Friday and people want to
4 start their weekend, so I'm going to try to move
5 along. I will tell you I'm not that great with the
6 remote setup and I do have numerous exhibits that I
7 would like to go over with you. I'm not quite the pro
8 yet that Ms. Bateman is, but with the court reporter I
9 hope that we'll be able to do this in a fairly quick
10 streamlined process.

11 Having said that, let's just -- you've
12 already indicated your name for the record. Have you
13 ever gone by any other names?

14 A No.

15 Q Have you recently married?

16 A Yes, in -- two years ago almost.

17 Q Okay. And you didn't change your name when
18 you got married?

19 A I did not.

20 Q All right. And so you got married; can you
21 state the month and the year you got married?

22 A I'm not sure how that's pertinent, but May
23 2021.

24 Q And what's your husband's name?

25 A Again, not sure how this is pertinent, but

1 Dominique Bischoff.

2 Q And when did you get engaged?

3 A March 2021.

4 Q And there have been some discussions about
5 your boyfriend going over to see Charletta Evans Sims
6 or Sims Evans; is that your current husband --

7 A Correct.

8 Q -- that went with -- that day?

9 A Yes.

10 Q All right. And what does your husband do?

11 A He is the co-founder and chief technology
12 officer for CompostNow.

13 Q And do you two live together in Raleigh?

14 A Yes.

15 Q And just trying to get, you know, limited
16 background information, but where were you born?

17 A Greenville, North Carolina.

18 Q And are your parents still living?

19 A They are.

20 Q And what is your mother's name?

21 A Rita Khazanie, R-I-T-A.

22 Q And does she work?

23 A She works at East Carolina University.

24 Q And in what capacity?

25 A She works at Joyner Library in the systems

1 department.

2 Q How long as she been at ECU?

3 A Since 1998.

4 Q And then your father; what is your father's
5 name?

6 A Prabhaker Khazanie.

7 Q And does he work?

8 A He is retired. He worked at the East
9 Carolina School of Medicine from -- at some point in
10 the 1970s until he retired, which I don't remember the
11 exact year.

12 Q And what did he do at the school of
13 medicine?

14 A He was a -- a director of the pathology and
15 clinical chemistry labs and he was a -- he was a
16 medical school professor.

17 Q Was he a doctor?

18 A He's a PhD.

19 Q Okay. All right. Do you have any siblings?

20 A I do.

21 Q And what are their names?

22 A My sister is Prateeti Khazanie and my
23 brother is Nirdhar Khazanie.

24 Q And what does your -- does your
25 sister -- well, where does your sister live?

1 A My sister lives in Denver, North -- in
2 Denver, Colorado.

3 Q Okay. And what does she do; does she work?

4 A She is a advanced heart failure
5 cardiologist.

6 Q And your brother, where does he live?

7 A He lives in Indianapolis.

8 Q And what does he do?

9 A He is a senior product manager at Meta.

10 Q All right. And I ask this of all witnesses;
11 how old are you right now?

12 A I'm 38.

13 Q And how old were you when you worked for
14 UNC?

15 A I was 34.

16 Q Okay. And what's the month of your
17 birthday?

18 A January.

19 Q Are you -- and again, I ask this of all
20 witnesses. Are you taking any medications today that
21 will impair your ability to understand questions and
22 answer accurately and truthfully?

23 A No.

24 Q All right. All right. I'm going to try my
25 hand at introducing some exhibits that I might be

1 using during the deposition.

2 MS. JOHNSON: Court Reporter, could you
3 please show her Exhibit Number 2?

4 (Exhibit 2 was marked for
5 identification.)

6 MS. JOHNSON: Well, actually, show her
7 Exhibit Number 1.

8 (Exhibit 1 was marked for
9 identification.)

10 BY MS. JOHNSON:

11 Q While he's pulling up those
12 exhibits -- again, just try to keep it moving,
13 Ms. Khazanie -- are you a U.S. citizen?

14 A Yes.

15 Q Are your parents U.S. citizens?

16 A Yes.

17 Q Have you ever lived permanently in another
18 country?

19 A Not permanently, no.

20 Q And you indicated that you were born in
21 Greenville; how long -- can you just kind of tell me,
22 like, you know, how long you stayed in Greenville and
23 the other places where you've lived?

24 A I was born and raised in Greenville; I lived
25 there until high school. I went to UNC Chapel Hill

1 for college. After college, I did some volunteer work
2 in India and then I came back to America. I lived in
3 North Carolina and then I lived in California for one
4 year after grad school and -- or eight months after
5 grad school.

6 And then I lived in DC from 2013 until the
7 end of 2017. And then I've lived in North Carolina
8 since the end of 2017 in the Raleigh area.

9 Q Thank you. What's the longest period of
10 time that you've ever lived in another country
11 continuously?

12 A One year.

13 Q And was that after you graduated from high
14 school or college?

15 A From college.

16 Q Okay. All right. And because this case
17 involves discrimination claims, I'm going to just ask
18 you, what national origin do you identify with?

19 A United States. American.

20 Q And what race do you identify with?

21 A Indian.

22 Q And what gender do you identify with?

23 A Female.

24 Q All right. And again, I ask this of every
25 witness. Have you ever been charged with any crimes

1 that aren't traffic related?

2 A No.

3 Q Have you ever been involved in any other
4 lawsuits?

5 A No.

6 MS. JOHNSON: All right. Court
7 Reporter, do we have Exhibit Number 1?

8 THE REPORTER: I believe I can pull it
9 up. You'll just have to bear with me one moment.

10 Are you able to see this?

11 MS. JOHNSON: That's perfect. Thank
12 you.

13 BY MS. JOHNSON:

14 Q So for Exhibit Number 1 -- if we were in the
15 same room, I would be handing this to you and your
16 attorney right now. But -- this -- is how we do
17 exhibits. And if you could -- let's see. Do I have
18 the ability to -- oh, yes. This is -- see that,
19 Ms. Khazanie? Can you see that this is your amended
20 complaint?

21 A Yes.

22 MS. BATEMAN: Kari, I'm just going to
23 tell -- it's Khazanie. That second A is not long.
24 It's not an A; it's short. It's a short A. Short
25 vowel. Khazanie.

1 MS. JOHNSON: Khazanie. That's what
2 I've intended to say. If I have not said that, I
3 apologize. Khazanie.

4 MS. BATEMAN: Just occasionally you say
5 "Khazanie."

6 MS. JOHNSON: Okay. Khazanie. Okay.
7 I apologize. That's been my intention. Now I'm going
8 to have anxiety --

9 MS. BATEMAN: I'm sorry.

10 MS. JOHNSON: Okay.

11 MS. BATEMAN: I did not mean to give
12 you anxiety. I'm sorry.

13 MS. JOHNSON: No, no.

14 BY MS. JOHNSON:

15 Q Ms. Khazanie, again, I apologize for that.
16 So is this not a copy of your amended complaint,
17 Exhibit 1?

18 A I believe so.

19 MS. JOHNSON: And, Court Reporter, are
20 you able to give me the ability to scroll? We've been
21 able to do that in other depositions.

22 MS. BATEMAN: I can tell you, Kari,
23 when I was able to scroll it was because I pulled it
24 up and shared my screen. So --

25 MS. JOHNSON: Okay. All right.

1 MS. BATEMAN: Yeah. If you have it,
2 even if it's not marked -- like when I pulled it up,
3 it wasn't marked but that's how I was able to scroll.
4 So if you can get to it on your computer --

5 MS. JOHNSON: All right. Well 00

6 MS. BATEMAN: -- and you can scroll. I
7 figured that out after the second deposition. I don't
8 want you to think that I knew that going in.

9 MS. JOHNSON: Well, Court Reporter, are
10 you able to scroll?

11 THE REPORTER: I can.

12 MS. JOHNSON: If you can just kind of
13 go through and just show her -- is there any
14 way -- pull it up to where, like, entire pages can be
15 on the screen? Would there -- that's -- if you just
16 kind of scroll -- pages to the end.

17 THE REPORTER: All right.

18 MS. JOHNSON: Perfect. Yeah. We'll
19 get this down.

20 MS. BATEMAN: Joshua, if you hit the
21 minus button it might bring the whole page up, you
22 know, if you just try to make it a little smaller.

23 THE WITNESS: If you just want to get
24 to page 18, you can type 18 in the page down at the
25 bottom.

1 MS. JOHNSON: Well, I just --

2 THE REPORTER: You just need me to go
3 to --

4 MS. JOHNSON: -- I'm trying to give you
5 the -- yeah. There you go.

6 BY MS. JOHNSON:

7 Q I'm trying to give you the ability,
8 Ms. Khazanie, if you need it, to just -- to you that
9 this -- fact -- what I've indicated Exhibit 1 is a
10 copy of your amended complaint. But my question to
11 you, is this in fact your amended complaint?

12 A Valerie would know better than me.

13 Q All right. And that's your signature at the
14 end, correct? That he's showing you right now.

15 A You would have to scroll up some. I can't
16 see.

17 MS. BATEMAN: That's actually the
18 notary's signature. Yeah. There we go.

19 THE WITNESS: That's -- that's my
20 signature.

21 BY MS. JOHNSON:

22 Q Okay. Thank you. And when's the last time
23 you looked at your amended complaint?

24 A Probably on November 21 -- November 26 of --

25 MS. JOHNSON: Okay. Oh, wait. Wait.

1 Hold on one second. Why are my e-mails showing up?
2 Okay.

3 Were y'all able to just see my e-mails?

4 MS. BATEMAN: No, I didn't see
5 anything. No. You --

6 MS. JOHNSON: Okay. All right.

7 MS. BATEMAN: You actually have to
8 share --

9 MS. JOHNSON: If you could pull up --

10 MS. BATEMAN: Yeah.

11 MS. JOHNSON: Thank you. If you
12 guys -- and, Court Reporter, if you could now pull
13 up -- all I need with that exhibit. If you could pull
14 up Exhibit Number 2?

15 THE REPORTER: Sure thing. One moment.

16 BY MS. JOHNSON:

17 Q And, Ms. Khazanie, Exhibit Number 2 is
18 Plaintiff's Supplemented/Amended Responses to
19 Defendants' First Requests for Admissions. If
20 you -- would you like to see all pages of this
21 document right now?

22 A No.

23 Q All right. And same question, when was the
24 last time you reviewed this document to best of your
25 memory?

1 A It -- I'm not sure. When -- whenever I
2 signed it. There have been several documents, so I'm
3 not sure the exact date.

4 Q Okay. Thank you.

5 MS. JOHNSON: And then, Court Reporter,
6 if you could pull up -- that's all for that exhibit
7 for now. If you could pull up Exhibit Number 3?

8 (Exhibit 3 was marked for
9 identification.)

10 THE REPORTER: One moment.

11 MS. JOHNSON: Thank you.

12 BY MS. JOHNSON:

13 Q And, Ms. Khazanie, Exhibit Number 3 is
14 Plaintiff's Responses to Defendants' First Set of
15 Interrogatories. And sort of the same question; do
16 you want me to show you all of the pages of that?

17 A No. I -- I trust that Valerie sent them.

18 Q All right. And when was the last time that
19 you saw that document --

20 A Whenever I signed --

21 Q -- prior to today? Okay. And --

22 A Whenever I signed --

23 Q Thank you. And so were you involved in
24 providing information for those interrogatories?

25 A I was.

1 Q All right. Thank you.

2 MS. JOHNSON: So that's all for that
3 exhibit right now, Court Reporter. Thanks.

4 BY MS. JOHNSON:

5 Q So Ms. Khazanie, when you worked at UNC,
6 what was your address?

7 A It was -- I forgot the number of my
8 apartment, but I lived on Spring Lake Boulevard,
9 Raleigh, North Carolina 27607, I believe. I lived in
10 Brier Creek in an apartment complex.

11 Q Did anybody live with you during the time
12 that you were employed at UNC?

13 A No.

14 Q And then since then where did you move to?
15 Because you're at a different address now. Where have
16 you lived since where you were living at the time you
17 were employed by UNC?

18 A I moved to the address I'm at now, 536 East
19 Lenoir Street. While I was -- UNC, I decided to move
20 to Raleigh.

21 Q Okay. So when you first started at UNC, you
22 lived in the Brier Creek area, which is -- is that
23 still Raleigh?

24 A Yes.

25 Q And then at some point while you were

1 working at UNC, you moved to your address on Lenoir
2 Street?

3 A Correct.

4 Q Do you recall about when you moved?

5 A My lease was up in November, so it's -- the
6 transition started in November.

7 Q So for the last couple of months you were
8 living in your Lenoir Street address, correct?

9 A Yeah. I -- some -- I started transitioning
10 around then. Correct.

11 Q Okay. Are you renting or do you own? Or I
12 guess owning is kind of probably a --

13 A I own my -- we -- we own it --

14 Q Okay. All right. And Lenoir Street, is
15 that closer to downtown Raleigh?

16 A Yes.

17 Q All right. So you moved further away from
18 UNC in November, correct?

19 A I officially moved in January. I gave my
20 notice of not renewing my apartment of 60 days in
21 November --

22 Q Okay. But --

23 A -- it started in November, but my -- my
24 address was Brier Creek until January of 2020.

25 Q Okay. But where did you actually live? I

1 mean, when did you actually physically start spending
2 time in your Lenoir house?

3 A Summer of 2020 -- I mean, 2019. Summer of
4 2019.

5 Q So then were you living at the Lenoir Street
6 house most of the time then?

7 A It -- Lenoir Street was my then-boyfriend's
8 house and I lived in Brier Creek. And some time I
9 would spend in downtown Raleigh and sometimes I was at
10 my apartment. We would go back --

11 Q Okay. Was there ever a time when you went
12 while you were employed at UNC and stayed permanently
13 at the Lenoir Street house?

14 A I had stayed there a few days at a time,
15 yes.

16 Q Where did you spend most of your time while
17 you were employed at UNC; the Lenoir Street house or
18 the Brier Creek apartment?

19 A Brier Creek apartment 'cause it was closer.

20 Q Okay. All right. I'd like to -- so I think
21 you've already testified to some of these questions,
22 but you went to high school -- you completed high
23 school in Greenville; is that correct?

24 A Correct.

25 Q And what year did you graduate from high

1 school?

2 A 2003.

3 Q And then I believe that was from Rose High
4 School?

5 A Correct.

6 Q And then did you go straight to UNC after
7 high school?

8 A I did.

9 Q All right. And then you graduated in 2007
10 from UNC?

11 A I did.

12 Q And what degree did you get at UNC?

13 A I had a bachelor of arts in anthropology
14 with a minor in African American studies.

15 Q All right. And did you graduate in four
16 years?

17 A I did.

18 Q And did you ever fail any classes in
19 college?

20 A I don't recall.

21 Q Let me ask you this, did you ever have to
22 repeat any grades in high school?

23 A No.

24 Q All right. And you say you can't recall if
25 you failed any classes in college?

1 A Yeah, I do not remember. That was 20 years
2 ago.

3 Q But it's a possibility that you failed some
4 classes?

5 A I did not -- I -- I was a pre-med major for
6 my first three semesters and I decided to switch
7 majors.

8 Q And then I have that you went to ECU and
9 that you got your -- was it your master's in May of
10 2012?

11 A I got a master's in accounting and an MBA in
12 finance.

13 Q And how long were you -- when did you start
14 ECU?

15 A I started at ECU in the fall of 2009.

16 Q Did you go continuously until May of 2012?

17 A Yes.

18 Q Did you fail any classes in graduate school?

19 A No.

20 Q While you were in either UNC or ECU, did you
21 ever file any complaints or grievances with the
22 school?

23 A Not formally.

24 Q Okay. Then let's go over -- while you were
25 at UNC, did you file any informal complaints?

1 A No.

2 Q While you were at ECU, did you file any
3 informal complaints?

4 A I had talked to a professor -- to a
5 department chair once about --

6 Q And what was --

7 A -- professor -- about a professor that was
8 just not very nice.

9 Q Can you tell me a little bit more about
10 that; what was the nature of your complaint?

11 A I don't remember all of the details. I just
12 remember that one of our professors was not -- not
13 providing office hours or not being very kind. I
14 don't remember the details.

15 Q Did you make any allegations of harassment
16 in that complaint?

17 A I don't remember.

18 Q Did you make any allegations of
19 discrimination in that complaint?

20 A He -- one professor did ask me why I don't
21 wear my head scarf and I told him that I was Hindu and
22 I don't wear a head scarf. And I did report -- report
23 that to the department chair.

24 Q Was this the same complaint that you were
25 just talking about or was that a separate complaint?

1 A That's -- that's the only complaint I can
2 recall.

3 Q Okay. And so when you made that complaint
4 to -- well, so let me just make sure I'm clear. So a
5 second ago we were talking about a complaint that you
6 made to somebody about a professor who didn't keep
7 office hours and so on --

8 A He was -- he was --

9 Q -- was that --

10 A He was the same professor; he was just -- he
11 has since deceased. I do not remember all of the
12 details. I don't even remember his name. And I don't
13 really know how that's pertinent here.

14 Q Okay. Do you recall what class he taught?

15 A Not a clue.

16 Q And you reported it to the department chair;
17 what came out of that?

18 A He talked to the professor and told him that
19 it was inappropriate.

20 Q And what department was it?

21 A Accounting.

22 Q And do you recall the name of the department
23 chair?

24 A I do not. This was 15 years ago.

25 Q All right. How about at UNC; did you make

1 any informal complaints about anybody there when you
2 were in college?

3 A No.

4 Q All right. And then I believe you testified
5 that after college is when you went to India for a
6 year?

7 A Yes.

8 Q And what did you do in India for a year?

9 A I worked at a school for mentally
10 handicapped children.

11 Q All right. And then you returned to the
12 United States?

13 A Correct.

14 Q Was it always your intention to return to
15 the United States?

16 A It was.

17 Q And if I asked you this, I apologize. I
18 have a habit of sometimes repeating questions. Did
19 you go straight from UNC to ECU?

20 A No. I went to India in-between.

21 Q Okay. So you -- that's right. You went
22 in-between. That's right. Okay.

23 MS. JOHNSON: And, Court Reporter --

24 BY MS. JOHNSON:

25 Q And then so you got your master's and MBA in

1 2012, correct?

2 A Correct.

3 Q And when you were getting your master's and
4 your MBA at ECU did you live with your family?

5 A I did.

6 Q Regarding that class that you took with the
7 professor in accounting that was the subject of the
8 complaint, do you recall what your grade was in that
9 class?

10 A An A or a B.

11 MS. JOHNSON: All right. Court
12 Reporter, if you could please --

13 BY MS. JOHNSON:

14 Q I'm going to show you, Ms. Khazanie,
15 Exhibit 4 and Exhibit 5.

16 (Exhibit 4 and Exhibit 5 were marked
17 for identification.)

18 And I will just tell you while he's pulling
19 them up that Exhibit 4 is your UNC application and
20 Exhibit 5 is LinkedIn materials from the internet.
21 And I will have you just take as long as you need to
22 look at those when he pulls them up.

23 And, Ms. Khazanie, while
24 he's -- pull -- those -- can -- putting on camera
25 again what -- I don't think we're able -- see right

1 now. I just want to see -- yeah. There you go. If
2 we just keep that on as much as -- that would be what
3 I would --

4 MS. JOHNSON: So Court Reporter, if you
5 could make that a little bit bigger so Ms. Khazanie
6 can -- look at each page of that?

7 BY MS. JOHNSON:

8 Q Yeah. Ms. -- if you could please tell the
9 court reporter, you know, if you want to take more
10 time on each page.

11 A Yes.

12 MS. JOHNSON: Is there any way we could
13 get it to -- by page, Court Reporter?

14 THE WITNESS: Okay.

15 MS. JOHNSON: Okay. That's fine.
16 Yeah. That's fine.

17 BY MS. JOHNSON:

18 Q Ms. Khazanie, are you able to see that?

19 A Yes.

20 Q All right. If you could just let him know
21 when you're ready for him to --

22 THE WITNESS: Yeah. You can keep
23 scrolling.

24 BY MS. JOHNSON:

25 Q And if you can, just keep telling him.

1 Yeah. If you want to stop on any particular page, let
2 him know.

3 THE WITNESS: Okay. You can
4 keep -- keep going. Yes. Okay.

5 BY MS. JOHNSON:

6 Q And -- does that application have -- ability
7 to look at it, does that refresh your recollection and
8 memory as to the applications that you filled out when
9 you applied for the position at UNC of senior
10 financial analyst?

11 A Yes. And submitted at 3:40 a.m. Correct.
12 After work.

13 Q So did anybody help you fill out that
14 application?

15 A No.

16 Q And you don't dispute that you're the one
17 who filled it out and submitted it, correct?

18 A Correct.

19 MS. JOHNSON: All right. And then if
20 you could just show, Court Reporter, number 5?
21 Exhibit Number 5.

22 BY MS. JOHNSON:

23 Q And I'll report to you or -- to you that
24 these are just -- when I pulled up LinkedIn for you,
25 this is what came out and I just copied it. And you

1 can --

2 A Okay.

3 Q I know that's kind of small, but --

4 THE WITNESS: Okay. Okay.

5 MS. JOHNSON: So Ms. -- oh, sorry.

6 THE WITNESS: Okay.

7 MS. JOHNSON: And I think that's the
8 last page; is that right?

9 BY MS. JOHNSON:

10 Q Ms. Khazanie, so regarding Exhibit Number 5,
11 is this what -- if somebody pulled up your LinkedIn
12 page, this is information that's included in your
13 LinkedIn page; is that correct?

14 A Yes. I have not looked at my LinkedIn page
15 in a while because I am employed happily, but yeah.

16 Q When was the last time you looked at your
17 LinkedIn page?

18 A I have not gone through details of it.
19 We -- we are frequently asked to post new -- new roles
20 for work since our team is growing.

21 Q So in terms of putting in the information
22 for your LinkedIn page, do you put that in or does
23 anybody else have authority from you to enter
24 information on your LinkedIn page?

25 A You put it in, but it's -- it's social media

1 in the end, so it's meant to look good.

2 Q So the information, though, that -- your
3 experience and the paragraph that starts right out
4 that is "about," that would be information you put in,
5 correct?

6 A Correct.

7 Q And I guess just to be clear, there's nobody
8 else that worked with or on behalf of you or has your
9 authority to put in information on your LinkedIn page
10 about you, correct?

11 A Correct.

12 Q All right. And the reason that I wanted to
13 show these to you is because I want to ask you some
14 questions about your employment history and I just
15 wanted to -- I know that there's information on both
16 Exhibit 4 and Exhibit 5 about your employment history.

17 A Okay.

18 MS. JOHNSON: Before I do that -- and I
19 apologize -- I need to take just a two-minute restroom
20 break. I once again drank too much coffee before the
21 deposition started. So we'll take just a two-minute
22 restroom break.

23 And, Ms. Khazanie, do you want to look
24 at those -- while I'm taking a break or --

25 THE WITNESS: No.

1 MS. JOHNSON: Okay. I just want to
2 make sure that you've got -- all right. So just two
3 minutes. I apologize. We'll be right back. Thank
4 you.

5 THE REPORTER: The time on the monitor
6 is 10:49 a.m.; we are now off the record.

7 (Off the record.)

8 THE REPORTER: The time on the monitor
9 is 10:53 a.m.; we are now back on the record.

10 MS. JOHNSON: All right.

11 BY MS. JOHNSON:

12 Q Ms. Khazanie, I'm going to ask you a couple
13 questions about your employment history and I'll
14 probably go in reverse.

15 MS. JOHNSON: And if you could -- Court
16 Reporter, if you could pull up Exhibit Number 4 again
17 just in case she wants to reference it?

18 BY MS. JOHNSON:

19 Q When I say "in reverse," what I mean is I'd
20 like to just talk about your employment after ECU.
21 And I believe we've already talked about your job that
22 you had in India. Did you voluntarily leave that job?

23 A Yes. I was only -- it was -- it wasn't a
24 job so much as a volunteer fun activity. I -- I
25 wanted to -- I had never lived in India 'cause I lived

1 in America my whole life and my grandparents were both
2 still alive and I wanted to spend time with them.

3 And I had -- when I was a junior at UNC, I
4 had won the Mahatma Gandhi Fellowship, which is a UNC
5 scholarship that they give two people every year. And
6 I had spent the summer after my junior year in India;
7 summer of 2006. And I really enjoyed the work I was
8 doing and I went to continue that work.

9 Q Do you still have extended family in India?

10 A I do.

11 Q And would that -- I believe you just
12 mentioned your grandparents?

13 A They're both since deceased.

14 Q All right. But did both your maternal and
15 paternal grandparents live in India?

16 A They did.

17 Q And then -- my understanding from looking at
18 Exhibits 4 and 5 is that while you were at ECU
19 or -- you were a graduate research assistant; is that
20 correct?

21 A I was. Correct.

22 Q And you indicate on Exhibit 4, which is your
23 UNC application, the different jobs and duties that
24 you performed at your various jobs, including as a
25 research assistant at ECU, correct?

1 A I -- yes. I believe that's --

2 MS. BATEMAN: Kari, we can't see that
3 on the application. All we see is the first page.

4 MS. JOHNSON: No. If you turn, Court
5 Reporter, to the 12th page of that exhibit? And we'll
6 just kind of go in reverse from there.

7 THE WITNESS: Okay.

8 MS. JOHNSON: So if you could, Court
9 Reporter, go to the page prior to that? Oh, actually,
10 never mind.

11 BY MS. JOHNSON:

12 Q You see where it says employer's name, East
13 Carolina University?

14 A Yes.

15 Q And then you -- the times, the years, that
16 you worked as a graduate student.

17 A Correct.

18 Q And you indicate you were part-time.

19 MS. JOHNSON: And if you could go to
20 the next page, please, Court Reporter.

21 BY MS. JOHNSON:

22 Q You list your primary job duties.

23 A Mm-hmm.

24 Q Is that screen full? I'm having trouble
25 seeing the screen from this distance.

1 A Yes. What it --

2 Q All right. And it says: conducting
3 research in statistics, primarily relating to business
4 and consumer relations; is that how that starts?

5 A Yes.

6 Q And you list out all the different things
7 that you did while you were working as a research
8 assistant. And you state at the very bottom of it
9 that you were instructor for tutorials using tools
10 such as Excel, Access, and Tableau to produce more
11 succinct and interactive data for financial decision
12 making, correct?

13 A Correct.

14 Q And is that accurate that you
15 were -- instructor -- these tools?

16 A I remember -- this is, again, from 2009, but
17 yes. I -- I did work with those tools.

18 Q Well, that's what you put down on your
19 application, correct?

20 A Yes. I was an instructor for those tools in
21 2009.

22 Q Okay. Okay. That's what I was asking you.
23 And then so after you got your MBA and your master's
24 in accounting, was your first job with McGladrey?

25 A Correct.

1 Q All right. And let me ask you this, were
2 you a research assistant the entire time you were at
3 ECU?

4 A It was a different title. Over the summers,
5 I did -- I -- I worked at the -- at the East Carolina
6 Foundation. Like, each time it was kind of different
7 titles over the summer and during the schoolyear.
8 'Cause you switch professors based on which semester
9 it is.

10 Q Did you ever get asked to leave any
11 positions with any particular professors?

12 A No.

13 Q Did you file any complaints against anybody
14 that you had to work with while you were -- research
15 assistant other than what you've already disclosed?

16 A No.

17 Q Okay. So your next job was at McGladrey in
18 California; did you get that job right out of ECU or
19 was there any time in-between?

20 A I signed on with them while I was
21 at -- while I was at --

22 Q And then so what were your duties at
23 McGladrey?

24 A I was an auditor who audited financial --

25 Q And why did you leave that job?

1 A I was -- I had moved to California for a guy
2 and we broke up. And I didn't want to be in
3 California anymore. After I -- after we broke up, I
4 had no longer -- no more reason to stay in
5 California -- and I asked my boss if she would
6 transfer me and there were no openings to transfer.
7 So at the end of busy season, I was let go 'cause I
8 wanted to leave.

9 Q All right. So you worked there for less
10 than a year, correct?

11 A Correct.

12 Q And you say you were let go. I mean, did
13 you resign or were you let go?

14 A At the end of busy season in accounting,
15 they often let people -- let most of the workforce go
16 in public accounting. This is a frequent practice in
17 public accounting that the end of busy season much of
18 the workforce is let go.

19 That is not a firing, but it is also not
20 a -- it's -- it -- it -- I got unemployment, so I
21 was -- it was considered a layoff. I was given --

22 Q All right. Well, did they --

23 A -- by the state of California, I was
24 given -- I was given unemployment insurance.

25 Q Did they keep some employees?

1 A I assume so. I had asked for a transfer to
2 leave anyway, so I actually was -- am not in touch
3 with anybody from my California time.

4 Q All right. But they kept some employees,
5 but not you, correct?

6 A Correct.

7 Q And you actually -- even though you wanted
8 to leave, you collected unemployment compensation
9 afterwards?

10 A Yes.

11 Q All right. So you didn't have another job
12 waiting for you?

13 A No.

14 Q And when was the next time that -- well, let
15 me ask you this. Were you ever disciplined while you
16 were at "McGladrey"? McGladrey.

17 A Not disciplined, no.

18 Q Well, why are you laughing? Did something
19 happen --

20 A Because --

21 Q -- at McGladrey?

22 A No. It's just public accounting. I -- I
23 did not enjoy it and I left.

24 Q All right. Did you ever get negative
25 reviews?

1 A I do not recall the details of that time. I
2 was -- I had just called off my wedding. I was in a
3 abusive relationship with my -- with my significant
4 other and he and I called off the wedding and I left
5 California. That is -- that is what I remember of
6 that time in my life.

7 Q Is it possible you got negative reviews and
8 disciplined?

9 A I was not disciplined.

10 Q Okay. Is it possible you got negative
11 reviews?

12 A I was never given any negative -- negative
13 feedback in anything written. I remember
14 just -- there was a constant feedback -- this is good,
15 this is bad, this is good, this is bad. It was the
16 first job I had after grad school.

17 Q Did you file any grievances or complaints
18 while you were there?

19 A No.

20 Q Did you make any allegations against anybody
21 regarding harassment or discrimination?

22 A Not that I -- I don't remember -- some of
23 these details, Kari, I don't remember vividly
24 something that happened 10 and 15 years ago. So
25 I'm -- to the best of my -- of my ability, I -- these

1 were jobs that I had over a decade ago and I learned
2 from them and I moved onto the next job; that's what
3 I -- that's what I remember.

4 We can spend hours combing through point by
5 point on here, but I don't think it is pertinent.

6 Q Well, I appreciate your opinion on that.
7 But were you asked to leave McGladrey?

8 A I was not asked to leave McGladrey. I asked
9 for a transfer from McGladrey. And when my boss said
10 there -- I was not going to get one, I was let go from
11 McGladrey.

12 Q All right. And is it possible that you made
13 a claim or allegations of harassment or discrimination
14 against people at McGladrey?

15 A Not --

16 Q You're saying you can't remember. I'm
17 asking you, is it a possibility?

18 A I do not recall. I've had a very -- yeah.
19 I don't --

20 Q So your next job was at Dixon Hughes
21 Goodman.

22 MS. JOHNSON: And if we could just go
23 to Dixon Hughes Goodman? And it's scrolling forward,
24 not -- yeah. It kind of goes in reverse. Do you see
25 Dixon -- yeah. There it is. And if you could go on

1 to --

2 BY MS. JOHNSON:

3 Q It indicates that you worked there from
4 September 2013 to June 2014, correct?

5 A Correct.

6 Q Do you see that, Ms. Khazanie?

7 A I do.

8 Q All right. So you left McGladrey
9 on -- 2013, so you didn't get another job until
10 September of 2013, correct?

11 A Correct.

12 Q I'm sorry. I can't hear you.

13 A I said, "Correct."

14 Q Okay. Thanks. And what did you do in the
15 interim?

16 A I studied for my CPA and I passed three of
17 the --

18 Q Did you --

19 A -- three of the four -- I -- I moved back to
20 North Carolina. I was -- I had just called off my
21 wedding. I was very emotional.

22 Q Okay. So did you move back in with your
23 parents?

24 A I did.

25 Q And then so you started with Dixon Hughes in

1 September of 2013 and you left that job in June of
2 2014. So that was another job that was less than a
3 year in duration, correct?

4 A Yes. I was in busy season and I repeatedly
5 got calls from recruiters at bigger firms like
6 Deloitte and Ernst & Young and Pricewaterhouse and
7 those are Big 4 companies. Deloitte called me several
8 times and then I interviewed with Deloitte while I was
9 still at Dixon Hughes. And I decided to leave Dixon
10 Hughes at the end of busy season and I did.

11 Q Okay. So you went straight from Dixon
12 Hughes to Deloitte, right?

13 A I did. I signed in June with Deloitte.

14 Q And am I saying that right, Deloitte?

15 A Correct.

16 Q How do you say that? Okay.

17 A Deloitte.

18 Q Deloitte. While you were at Dixon Hughes,
19 were you ever disciplined?

20 A I was not disciplined.

21 Q Did you ever get any negative reviews?

22 A I did have a tough manager. There were two
23 main senior managers and one was very
24 supportive -- that's Mike Brown that's listed
25 there -- and another one that was not so supportive.

1 And she was just not an easy person to work with. So
2 I tried to focus on working on projects with Mike
3 Brown.

4 Q So my question was, did you get negative
5 reviews -- I mean, did this one supervisor -- you
6 negatively?

7 A Mike Brown gave me very positive reviews and
8 the other person did not give me positive reviews.
9 She was very difficult to work with.

10 Q Okay. And what made her difficult to work
11 with?

12 A She would not give feedback. She was -- she
13 was just not kind if you asked a question. If
14 anything was good, she did not praise good work. It
15 was just a difficult place to work -- or projects were
16 difficult with her, which is why I focused on working
17 with Mike Brown and why I --

18 Q And do you recall -- sorry.

19 A Do I recall what?

20 Q Sorry. I didn't mean to interrupt you.
21 Sometimes it's hard with remote. Do you recall what
22 her name was?

23 A No, not at all.

24 Q You don't -- you recall Mike Brown's name,
25 but you don't recall her name?

1 A Mike Brown's name is written right there.

2 Q So did you file a grievance against her?

3 A No.

4 Q Or anybody at Dixon Hughes?

5 A No.

6 Q Did you make any allegations or informal
7 complaints to anybody regarding harassment or
8 discrimination while you were at Dixon Hughes?

9 A No.

10 Q And were you looking for a job at Deloitte
11 or did Deloitte come to you?

12 A Deloitte -- Deloitte came to me. Deloitte
13 reached out to me several times on LinkedIn and
14 e-mailed me, called me. And I -- when I interviewed,
15 I was very impressed.

16 Q All right. And you've had a chance to --

17 A And Deloitte was the number one -- in
18 the -- in finance of the Big 4 in the country. So it
19 was an honor to be asked to go to -- to Deloitte.

20 Q And I don't want to take up unnecessary time
21 going through all your primary job duties at these
22 places you've listed out on this application. But you
23 don't dispute that you listed out your job duties on
24 this application and that you tried your best to be
25 accurate about what your job duties were, correct?

1 A Correct.

2 Q All right. So your next job after Deloitte,
3 you stayed at Deloitte until -- you worked at Deloitte
4 according to your application from June 2014 to July
5 2016. So you stayed there two years, correct?

6 MS. BATEMAN: Kari, I just have
7 to -- yeah. Can you scroll up? Because she can't see
8 that.

9 MS. JOHNSON: Okay. Yeah.

10 MS. BATEMAN: And I can't see it.

11 MS. JOHNSON: Here you go. Sorry.

12 Court Reporter, do you mind scrolling
13 to the --

14 MS. BATEMAN: He did. He did. We're
15 there.

16 MS. JOHNSON: -- they're not -- all
17 right. Thanks.

18 BY MS. JOHNSON:

19 Q Ms. Khazanie, do you see where you state you
20 worked there from June 2014 to July 2016?

21 A Correct.

22 Q And you state that you left -- reduction in
23 force, worked on the 2016 election --

24 MS. BATEMAN: Can you --

25 MS. JOHNSON: Yeah. It's down there.

1 Oh, wait.

2 MS. BATEMAN: We can't see it.

3 MS. JOHNSON: Can you scroll down a
4 little bit, Court Reporter?

5 Sorry. Yeah. There you go.

6 BY MS. JOHNSON:

7 Q Do you see that, Ms. Khazanie?

8 A Correct.

9 Q And please just let me know when you can't
10 see. I'm a little bit of a distance from -- we've got
11 this screen here. I want you to be able to see. But
12 you see where you state that you left because it was a
13 reduction in force and you worked on the 2016
14 election?

15 A Yes.

16 Q So which was it; was it reduction in force
17 or did you leave to work on an election?

18 A There was -- I left because there was a
19 reduction in force and then I started volunteering
20 with the 2016 election. There was a reduction in --

21 Q Okay. So you didn't --

22 A It was -- there was a layoff at Deloitte,
23 which layoffs happen all the time, and I was laid off.

24 Q So was everybody laid off?

25 A There were -- the people I kept in touch

1 with from Deloitte said that it was called the
2 bloodbath.

3 Q But you were --

4 A 'Cause Deloitte --

5 Q -- one of the ones that was --

6 A I -- I was one of the ones that was let go.
7 And if you -- I mean, it's -- it's a thing that
8 happens in business.

9 Q While you were at Deloitte, were you ever
10 disciplined?

11 A No.

12 Q Did you ever get negative reviews?

13 A No.

14 Q Did you have problems with any of your
15 supervisors there such as what you talked about at
16 your prior job?

17 A No. I enjoyed my time at Deloitte.

18 Q Did you ever file a grievance?

19 A No.

20 Q Did you ever make any allegations of
21 harassment or discrimination against anybody at
22 Deloitte?

23 A No.

24 Q Did you collect unemployment benefits after
25 you left Dixon Hughes?

1 A I believe I did for the period before -- I
2 don't -- I don't remember. I don't remember.

3 Q Okay. Did you collect unemployment benefits
4 after Deloitte?

5 A Yes.

6 Q And you can't collect unemployment benefits
7 if you leave voluntarily, correct?

8 A Yes.

9 MS. BATEMAN: I'm going to object to
10 asking the witness a question that requires a legal
11 conclusion.

12 MS. JOHNSON: All right.

13 BY MS. JOHNSON:

14 Q So the next place that you worked was The
15 Washington Post, correct?

16 A Correct.

17 MS. JOHNSON: And, Court Reporter, if
18 you could, the part about The Washington Post starts
19 two pages over.

20 BY MS. JOHNSON:

21 Q And your job there was financial analyst,
22 correct?

23 A Correct.

24 Q And then you worked there from February of
25 2017 to July of 2017, correct?

1 A Correct.

2 Q And so you left Deloitte in July of 2016,
3 correct?

4 A Correct.

5 Q And then you started at The Washington Post
6 in February of 2017?

7 A Correct.

8 Q Do I have that right?

9 A Correct.

10 Q So you were unemployed for several months at
11 least, correct?

12 A That is correct.

13 Q And you collected unemployment insurance
14 during that time?

15 A I believe so. I'll have to go back and look
16 at records.

17 Q Okay. Did you come back and live with your
18 family in North Carolina during those months?

19 A No, I stayed in DC.

20 Q And so you only worked at The Washington
21 Post for several months; is that correct? Five months
22 approximately?

23 A Yes.

24 Q Right. And it states here on your
25 application that you submitted to UNC that the reason

1 you left was because you wanted to leave Washington,
2 DC, and move back to North Carolina with -- family is,
3 correct?

4 A Correct.

5 Q And that's not accurate, though; is it?

6 A I -- I do not want to get -- I did not want
7 to get into the details of The Washington Post.

8 Q You were terminated from The Washington
9 Post, correct?

10 A I -- I complained at The Washington Post
11 about -- to a safe -- they had -- they had phone
12 numbers in the break room; if your boss is harassing
13 you, call this number. And I called that number,
14 talked to the helpline, and then was asked to resign.

15 Q All right. But let me just ask you this
16 question and then I want to talk a little bit more
17 about Washington Post. But on your application for
18 UNC, you said that the reason you left was because you
19 wanted to leave DC; you do not indicate that you were
20 terminated, correct?

21 A Correct.

22 MS. BATEMAN: Well, objection. She
23 didn't testify she was terminated. She testified that
24 she was asked to resign. So that's assuming facts not
25 in evidence.

1 MS. JOHNSON: All right. Well, then,
2 if we could, Court Reporter, can -- pull up Exhibit
3 Number 3, the interrogatory?

4 MS. JOHNSON: And if you could go to
5 page 21 -- actually, page 20. I'm looking for
6 number 23, which is at the bottom of page 20. If I
7 can read the question.

8 There it is. All right.

9 BY MS. JOHNSON:

10 Q So the question on the interrogatories that
11 you completed or that were produced to me, it says:
12 have you ever filed a grievance or a discrimination or
13 harassment complaint (formal or informal) against any
14 other educational institution, employer, or fellow
15 employee, state the date of the complaint, the
16 individual or entity to whom you made the complaint,
17 the individual(s) whose conduct you reported in the
18 complaint, and a summary of the allegations against
19 the subject of the complaint.

20 MS. JOHNSON: And that goes on to the
21 next page, Court Reporter.

22 BY MS. JOHNSON:

23 Q And do you see your response?

24 MS. JOHNSON: If you can scroll up a
25 little bit, Court Reporter, to show the response on

1 page 21?

2 BY MS. JOHNSON:

3 Q Your response is: when I was at The
4 Washington Post, myself and nine other BIPOC were
5 mysteriously terminated within a six-month period. Do
6 you see that?

7 A Correct.

8 Q So you were terminated from that position,
9 correct? According to your discovery responses.

10 A I don't remember the -- the details of the
11 termination, but yes.

12 Q All right. So your application, then, that
13 you submitted to UNC was not correct on that point,
14 correct?

15 A I -- in -- in job applications, it is
16 customary and advised to always put a -- get into
17 details if you are asked later, but you answer job
18 applications in a -- in a way that is presenting
19 your -- your best foot forward and then you give
20 details. I can't --

21 Q Well, how would they know --

22 A -- I cannot put in a job application that
23 was a part of a group of people -- of people of color
24 who were terminated on a job application. And I did
25 want to -- I did want to move back to North Carolina

1 and I did move back to North Carolina the week
2 following this event. But I had to put my best
3 forward on a job application and that is what I did.

4 Q So Ms. Khazanie, though, they -- opportunity
5 to -- you about the termination because they didn't
6 know about it, correct, when you interviewed at UNC?

7 A Correct. But that was a blip in time over
8 my career. It was a short --

9 Q Did you -- sorry. I didn't mean to
10 interrupt you again. It's this remote --

11 A It was a very short period of time in my
12 work history and I don't think that it was at all
13 indicative of my -- my ability to work and my ability
14 to have knowledge about performing as a high level
15 financial analyst.

16 Q So did you clarify during the interview
17 process that you had actually been terminated at The
18 Washington Post?

19 A I was never asked about my time at The
20 Washington Post during my interview.

21 MS. JOHNSON: Can you, Court Reporter,
22 go back to Exhibit 4?

23 Thank you, Court Reporter. The very
24 last page of Exhibit 4.

25 //

1 BY MS. JOHNSON:

2 Q Do you see that paragraph that says
3 "certification"?

4 A Yes. I hereby certify that all information
5 included is true and complete to the best of my
6 knowledge and belief. And I signed it at 3:40 in the
7 morning. My -- my -- I wanted to move back to North
8 Carolina. I wanted to be closer to my family. My
9 parents were getting older; my father was having
10 health issues.

11 And moving back to North Carolina was
12 definitely something that I was trying to do.
13 And -- as opposed to getting into the details of
14 everything that happened in Washington, DC, I was
15 focused on trying to move back -- Carolina.

16 Q So at The Washington Post, what you state
17 in -- well, what you were just testifying to is that
18 you said you made some sort of phone call and
19 indicated that somebody was harassing you; is that
20 correct? What were you testifying to a little while
21 ago and that you got asked to leave after you made a
22 phone call?

23 A Yes. That was -- that was prior to -- when
24 I was at The Washington Post, as I wrote in my
25 deposition or in my responses, that there was a group

1 of people that were just being harassed; I was in that
2 group of people.

3 And I was not protected by the union and I
4 called the helpline that says if you are having
5 issues, please call that number. It is very similar
6 to my going to Steve Ragan in this case and saying
7 that I don't like the way that my employer is treating
8 me.

9 And I felt that I was protected by human
10 resources to make that concern known. And as opposed
11 to being protected, I was retaliated against.

12 Q And did -- well, let me ask you this, so
13 what type of harassment did you suffer at Washington
14 Post?

15 A I would have to go back and read the notes
16 from then. It has been a while. But it was -- it was
17 not good enough to want to stay.

18 Q Well, but you just indicated that it was
19 similar to what you experienced at UNC --

20 A Yes. Because the --

21 Q -- we have a right to --

22 A Because when you have -- when you have a
23 boss -- and in this case, this case is about Katie.
24 When you have a boss that bullies you and makes
25 comments towards you and is unkind to you and does not

1 give feedback to you, there is no recourse for people
2 to tell anyone about that.

3 And in this case specifically, I put every
4 bit of knowledge I had from past jobs towards this. I
5 knew what I was doing. And when I asked for feedback,
6 I was not given feedback. When I produced work --

7 Q Okay. I'm talking about The
8 Washington -- oh, sorry. I'm talking about The
9 Washington Post. I just want to make sure the
10 record's accurate. Are you talking right now about
11 The Washington Post?

12 A I don't remember exactly what happened at
13 The Washington Post, but I had a very cruel boss at
14 The Washington Post.

15 Q Well, was your boss female or male?

16 A Female.

17 Q Did you --

18 A And she had --

19 Q Go ahead.

20 A She -- she got rid of every person of color
21 in that group.

22 Q So how was she mean to you?

23 A She -- she was just -- I don't know what
24 details you're trying to get out of this.

25 Q Well, what were your allegations against

1 her? I mean, it sounds like it --

2 A She could not --

3 Q -- was a big event --

4 A She could not -- she could not find a sheet
5 of paper one day. And as opposed to just looking in
6 her desk, she started screaming that I stole from her,
7 which there are cameras all over The Washington Post.
8 And I said, "I don't know what you're talking about.
9 I'm just sitting at my desk." And I said --

10 Q Do you recall anything else?

11 A I recall --

12 Q About --

13 A I recall her not -- I -- I don't recall all
14 the other details, no.

15 Q Do you recall any other details?

16 A No. I would have to go back and read.

17 Q What would you read?

18 A Notes from that time period.

19 Q Did you file a grievance --

20 A I filed an EEOC complaint.

21 Q All right. Do you have the documentation
22 for your EEOC complaint?

23 A No, I do not. Not --

24 Q Did you --

25 A Not readily --

1 Q Sorry. Thanks. Did you allege
2 discrimination in that case, in your EEOC charge?

3 A I think that is the nature of EEOC.

4 Q Okay. What kind of discrimination did you
5 allege in your charge?

6 A I believe it was racial.

7 Q All right. And do you recall what her name
8 was?

9 A No, I don't.

10 Q Was her first name Sarah?

11 A Could be, yes.

12 Q Did you ever Google and look her -- while
13 you were on your work computer at UNC?

14 A I don't remember.

15 Q If you were Googling her and looking her up
16 on your UNC computer, that wouldn't have been related
17 to a work project at UNC; would it have?

18 A No, I don't remember.

19 Q Okay. But you think her first name might be
20 Sarah?

21 A That sounds possible.

22 Q All right. So you indicate that nine other
23 employees were also terminated at the exact same time
24 as you?

25 A It's not the exact same time. I said over a

1 period of time.

2 Q All right. And what was the -- and I'm
3 trying to move this along, but this stuff -- I do have
4 a right to ask you about these things. What was the
5 outcome of your EEOC charge and your EEOC complaint?

6 A I believe there were no findings.

7 Q Were you ever disciplined at Washington
8 Post?

9 A Not disciplined, no.

10 Q You were terminated, though, right?

11 A Yes.

12 Q Were reasons given to you as to why they
13 were terminating you?

14 A I don't remember.

15 Q So you don't recall?

16 A I don't recall the exact reasons. But
17 I -- I -- said that it was -- I -- I told -- it felt
18 like retaliation, which is exactly how I feel right
19 now. That if you speak to -- power, if you tell
20 anybody that your boss is unkind, you get -- somebody
21 like you -- an attorney comes.

22 And they -- or some sort of legal action
23 comes that proves that you were not telling -- or
24 tries to prove that you were not telling the truth.
25 In the news, you see all these great stories about

1 people that came up and said something and spoke up
2 and whistleblowers, but if you try to blow a whistle,
3 there's a person like you that says, "That's not
4 okay."

5 And it's -- it's really -- it's really sad
6 and it makes -- it -- it's just -- it's really
7 disappointing.

8 Q Well, Ms. Khazanie, this case is not about
9 me; this case is about the claims that you've made.
10 And you do understand that defendants have a right to
11 defend themselves against allegations, correct?

12 A I understand that I -- I -- it's not -- it's
13 not fair that they're --

14 Q And you --

15 A Continue.

16 Q You're talking about me personally. You and
17 I have never met before today, correct?

18 A Correct.

19 Q So did you have a lawyer assisting
20 you -- and I don't want to know anything you and your
21 lawyer talked about. Did you have a lawyer assisting
22 you in your EEOC complaint against The Washington
23 Post?

24 A No.

25 Q So your next job after The Washington Post

1 was with Credit -- another name I have trouble with.

2 Credit "Suisse"? Is that how you say that? Credit

3 Suisse? How do you say that, Ms. Khazanie?

4 A Credit Suisse.

5 Q Suisse. Okay.

6 MS. JOHNSON: If we could go back now
7 to Exhibit 4, Court Reporter, to the page that says
8 Credit "Suisse"?

9 THE WITNESS: Suisse.

10 MS. JOHNSON: Suisse. Apologize.

11 THE REPORTER: Sure thing. One moment.

12 BY MS. JOHNSON:

13 Q All right. So do you see -- right. So you
14 indicate that you started at Credit Suisse -- when did
15 you start at Credit -- oh. You started January 8,
16 2018, correct?

17 A Correct.

18 Q So there was, again, several months
19 in-between the time you worked at Washington Post
20 until the time you worked at Credit Suisse, correct?

21 A Correct. I signed with Credit Suisse in the
22 fall.

23 Q Okay. And did you collect unemployment
24 benefits after Washington Post?

25 A No.

1 Q Did you collect unemployment benefits after
2 you left UNC?

3 A I did.

4 Q Okay. So Credit Suisse, when they ask you
5 on this application if they could contact them you
6 said "no," correct?

7 A Correct. 'Cause I was still employed.

8 Q Right. And you state that the reason you
9 were looking for a job is -- down there, you say: I
10 was looking for a better work life balance.
11 Investment banking hours are very long (often hitting
12 75 hours a week); is that correct?

13 A [No audible response.]

14 Q Is that what you stated on there?

15 A Correct. Yes.

16 Q Sorry. We have to verbalize our responses
17 for the transcript. On the very next page of this
18 application --

19 MS. JOHNSON: Court Reporter?

20 BY MS. JOHNSON:

21 Q -- you list out job duties -- Credit Suisse?

22 A Correct.

23 Q Is that an accurate description of what you
24 were doing there?

25 A Yes.

1 Q And you stayed at Credit Suisse for about a
2 year before you started looking for another job?

3 A Correct.

4 Q All right. Were you ever negatively
5 reviewed at Credit Suisse?

6 A No.

7 Q Were you ever disciplined?

8 A I was not disciplined.

9 Q Did you ever file any grievances?

10 A I did file grievances because I had a
11 difficult situation there.

12 Q And what was your difficult situation?

13 A I had a new vice -- I was an assistance vice
14 president. They brought in a new vice president from
15 India who was given company transportation for 30
16 days. After 30 days, he did not know how to drive and
17 asked me to pick him up and drop him off every day,
18 and I did so for a week.

19 Then he asked me to continue to do it and I
20 did it for several weeks because I felt very
21 pressured. And then one day he asked me to come up to
22 his apartment and I said, "No." And when we were at
23 work, he would yell at me and intimidate me and say
24 disparaging things about my appearance and it was
25 harassment.

1 And I reported it to Credit Suisse, who then
2 decided that every morning -- because he was harassing
3 me in front of others -- that we had to meet with the
4 director present and watching all of our interactions.
5 And ultimately, I was given a different reporting
6 structure. I no longer had to report -- and I had --

7 Q Okay --

8 A Yeah.

9 Q Go ahead. Sorry.

10 A That -- that's --

11 Q And what were --

12 A That is what happened.

13 Q Were you upset with the manner in which that
14 was resolved?

15 A I was happy that I no longer had to report
16 to him. It was very difficult to be sexually harassed
17 and that was why I started looking for different jobs.

18 Q Did --

19 A And I also worked 'til -- very late nights,
20 which is why I applied for this job. And you can see
21 that the timestamp on my application was 3:40 a.m. and
22 that was after work.

23 Q Was that a written formal investigation,
24 your sexual harassment complaint?

25 A Yes.

1 Q And did you allege any type of
2 discrimination in that complaint?

3 A No. It was -- I don't remember exactly, but
4 I did write that it was sexual harassment and that it
5 was intimidation that he had -- that I had to pick him
6 up and drop him off; that's not at all in my job
7 description.

8 Q Who was your supervisor at Credit Suisse?

9 A My director was Linda Wastie.

10 Q Any other complaints or allegations that you
11 had made against any employees at Credit Suisse?

12 A No.

13 Q And then you worked at UNC after Credit
14 Suisse, correct?

15 A Correct.

16 Q And my understanding is that you started at
17 UNC on January 14, 2019; is that correct?

18 A [No audible response.]

19 Q I'm sorry?

20 A Correct.

21 Q Yeah. You just have to -- for the court
22 reporter, just make sure we're verbalizing out loud
23 our answers.

24 And then your UNC position ended January 6,
25 2020, correct?

1 A Correct.

2 Q All right. When did you -- what was your
3 very next job?

4 A After leaving UNC?

5 Q Correct, yes.

6 A I was hired by Pendo.

7 Q And what was your start date at Pendo?

8 A January 4, I believe, 2021.

9 Q Of what --

10 A 2021.

11 Q All right. And did you sign on with them
12 beforehand?

13 A I did. I signed on in December.

14 Q All right. But you didn't actually start
15 working until January 2021?

16 A Correct.

17 Q On your LinkedIn page -- and if you want to
18 see this --

19 MS. JOHNSON: Actually, can we pull up
20 Exhibit Number 5?

21 THE REPORTER: Sure thing. One moment.

22 BY MS. JOHNSON:

23 Q Do you see under experience --

24 MS. JOHNSON: If you scroll down?

25 Okay.

1 BY MS. JOHNSON:

2 Q -- where it says senior financial analyst
3 and then it has underneath that Pendo?

4 A Mm-hmm.

5 Q You have on there 2020 to present, three
6 years; is that not --

7 A That's just -- that's just how the software
8 works. I signed in December, which is when I
9 announced it at -- on LinkedIn. And if you were to
10 put December 2020 and ending January 1, 2021, that
11 would say one year. It is just how -- how the
12 software works.

13 Q But you didn't actually start --

14 A But it's --

15 Q You didn't start working --

16 A I don't have months there.

17 Q Well, you have a year and it's not the year
18 you started working with them, correct?

19 A It is the date I announced it on my
20 LinkedIn, which was when I signed in December.

21 Q Okay. And you're still currently employed
22 at Pendo?

23 A I am.

24 Q Did you tell them you resigned or were
25 terminated from UNC?

1 A I do not remember what happened in my
2 interview, but --

3 Q Well, did you do a written application?

4 A I did.

5 Q So you don't recall whether or not you
6 discussed your situation or how you described why you
7 left UNC?

8 A I -- most of my -- most everybody at Pendo
9 knows what happened at -- knows what happened at UNC.

10 Q But you can't recall what you put on your
11 application?

12 A No. I don't recall the exact application
13 from two years ago -- over two years ago.

14 Q Do you recall whether or not -- what you
15 told them about why you left Washington Post?

16 A Pendo is a very forward-looking company and
17 Pendo has -- did not ask me all of these details.
18 Because I think they're -- they're very open about the
19 fact that people switch jobs. And the important part
20 of our job is whether or not we can do the work and I
21 do the work really well.

22 Q And so who was your supervisor at Pendo?

23 A Currently, his name is Jason --

24 Q Yes.

25 A -- Jason Blaszcak.

1 Q Have you ever been disciplined at Pendo?

2 A No.

3 Q Have you ever received any negative reviews?

4 A No. I was just promoted at Pendo.

5 Q Have you ever filed any grievances at Pendo?

6 A No.

7 Q Have you made any allegations of
8 discrimination or harassment against anybody at Pendo?

9 A No. I've loved my time --

10 Q And what is your salary at Pendo?

11 THE WITNESS: Valerie, do I have to
12 answer that?

13 MS. BATEMAN: You do. I'm sorry. It
14 goes to your damages.

15 THE WITNESS: It is \$126,000.00.

16 BY MS. JOHNSON:

17 Q And has your salary been the same the whole
18 time?

19 A No. I --

20 Q What did --

21 A I --

22 Q What'd you start with?

23 A 106.

24 Q All right. And then have you gone up to 126
25 or was that with your promotion that you got the bump?

1 A I went up to 115 and then I went up to 126
2 as of this past week.

3 Q Oh, well congratulations. What was your
4 position when you started?

5 A It's -- I have not changed my LinkedIn. It
6 is now a manager position.

7 Q Okay. Just for the record, what was your
8 title when you first started? I'm just trying
9 to -- what your titles have been at Pendo?

10 A Financial analyst.

11 Q And then when -- you were first financial
12 analyst and then did your title change at any time?

13 A Now, it is -- I need to update my LinkedIn;
14 I haven't touched it. But it just changed to manager.

15 Q Just to manager or manager -- who do you
16 manage?

17 A There are two types of manager positions.
18 You can -- I think in the system it's called senior
19 financial analyst II. It is a manager of FP&A, of
20 financial planning and analysis. It is a -- it is an
21 IC manager -- which means individual
22 contributor -- only we have a small team, so I do not
23 manage any people.

24 Q All right. I want to start talking to you
25 now about the UNC position. We've been going about an

1 hour, so I do think it's a good idea for everybody to
2 just stand up for two minutes every hour or so. But I
3 think we are making some progress here, Ms. Khazanie.

4 MS. JOHNSON: So if we can just take a
5 two-hour -- two-hour? -- a two-minute -- obviously, I
6 need a break -- two-minute break and then we'll return
7 in two minutes, everybody? Court Reporter?

8 THE REPORTER: All right. The time is
9 11:51 a.m.; we are now off the record.

10 (Off the record.)

11 THE REPORTER: The time on the monitor
12 is 11:57 a.m.; we are now back on the record.

13 MS. JOHNSON: All right. If you could
14 pull up Exhibit 4 real fast one more time, Court
15 Reporter, the UNC application?

16 THE REPORTER: Sure thing.

17 Pulling up now. Just let me know what
18 page you want me to put it on.

19 MS. JOHNSON: If you could actually go
20 the second page?

21 And scroll down to the bottom where it
22 says voluntary demographic data. The very bottom.
23 Yes. There you go.

24 BY MS. JOHNSON:

25 Q Ms. Khazanie, do you see where it -- race

1 and it has "Asian"? Is that just a typo on your part?

2 A There is no -- there is no -- if you look at
3 the phrase "Asian," it -- anytime in you -- when you
4 pick on a -- on a application, Asian includes the
5 Indian subcontinent.

6 Q Okay. All right. Just wanted to clarify
7 that. And then -- back to -- and I don't think we
8 need to scroll for this. But you indicated on your
9 application that your supervisor at Credit Suisse was
10 Linda Wastie; is that correct?

11 A She was my director, correct.

12 Q Did you have a good relationship with her?

13 A Fantastic.

14 Q All right. All right. And on your
15 application, you list your core -- at the very
16 end -- well, actually, hold on one second.

17 So on the second to the last page of this
18 exhibit --

19 MS. JOHNSON: If you could scroll down
20 to that, Court Reporter? The second to the last page.
21 BY MS. JOHNSON:

22 Q And I'm not going to have you read that onto
23 the record to -- move this along. But, Ms. Khazanie,
24 were those answers to the supplemental questions, were
25 they truthful and accurate descriptions of some of

1 your skills and abilities and experience?

2 A Yes.

3 MS. JOHNSON: All right. And then,
4 Court Reporter, if you could pull up Exhibit
5 Number -- I believe it's 13.

6 (Exhibit 13 was marked for
7 identification.)

8 THE REPORTER: One moment, please.

9 BY MS. JOHNSON:

10 Q Ms. Khazanie, do you recall that when you
11 submitted your application to UNC you also -- at the
12 same or throughout the interview process submitted a
13 CV?

14 A Yeah.

15 Q And is Exhibit 13 the CV that submitted?

16 A Probably. Like I said, it was at 3:00 a.m.
17 four years ago.

18 Q Right.

19 MS. JOHNSON: And if you could, Court
20 Reporter, turn to the second page? At the end there
21 where it says "core competencies."

22 THE WITNESS: Yes.

23 BY MS. JOHNSON:

24 Q Ms. Khazanie, could you just read the first
25 two bullet points?

1 A Data management and budget forecasting and
2 analytics - Excel, SQL, Oracle, Hyperion/Essbase, SAP,
3 and Tableau.

4 And then accounting, audit, and finance
5 (eight years) - financial statement audit and
6 financial projections and modeling.

7 Q And these were core competencies that you
8 had at the time you applied to UNC, correct?

9 A Correct.

10 Q I'm sorry?

11 A Correct.

12 Q Did you -- yeah. So how did you hear about
13 the job -- UNC?

14 A I think I just searched on LinkedIn or a job
15 posting. I don't -- I don't remember exactly. I know
16 I saw it somewhere online. No one told me about it.

17 MS. JOHNSON: We can take the exhibit
18 down for now. And actually, can you pull up Exhibit
19 Number 6?

20 (Exhibit 6 was marked for
21 identification.)

22 THE REPORTER: Sure thing. One moment.

23 BY MS. JOHNSON:

24 Q Ms. Khazanie, have you -- when you were
25 reading about the job and making the decision to apply

1 for it, do you recall reading a description of the
2 position that you were applying for?

3 A Yes.

4 Q And the position that you were applying for
5 was senior financial analyst, correct?

6 A Correct.

7 Q So you knew it was a senior position,
8 correct?

9 A Correct.

10 Q And do you recall if you ever saw this
11 description form of it?

12 A I've -- I had never seen this --

13 Q I apologize. I'm having a little bit of
14 trouble hearing you. What did you --

15 A I said -- I said I had never -- I had never
16 seen this form.

17 Q All right. But were you aware that the
18 position was an advanced level --

19 A Yes.

20 Q -- required advanced level analysis and
21 modeling?

22 A Yes.

23 Q And were you made aware either in whatever
24 materials you reviewed or through the interview
25 process that they wanted the person who was ultimately

1 placed in the position to operate at a high level of
2 autonomy?

3 A I assumed that's for all positions.

4 Q But particularly for a senior position,
5 correct?

6 A Correct. And Katie regularly praised me
7 about how amazing my skills were and how good the work
8 was that I was doing.

9 Q Did they tell you that one of the reasons
10 that they needed somebody to be in this spot was
11 because Katie was not able to do all of the work on
12 her own and needed somebody to work independently with
13 her to help her do these projects?

14 A I don't remember the exact wording they
15 used, but that sounds very similar.

16 Q And did you understand that you were going
17 to be asked to independently generate, manage, and
18 analyze financial models?

19 A Which I did on a regular basis and I
20 produced dozens of financial models independently.

21 Q And can you look down at -- can you just
22 actually -- you say you've never seen this particular
23 form. But could you read on page 2 of 5 where it says
24 down there description of work duties and
25 responsibilities onto the next page?

1 A Okay.

2 Q Do you agree that those were what you were
3 told and what you understood your duties and
4 responsibilities to be?

5 A I mean, this is a -- I've never seen this
6 description before, but this is what I did.

7 Q Okay. So I'm just asking you, is that your
8 understanding of what your duties and responsibilities
9 were while you were at UNC?

10 A Yes.

11 Q And would you agree that it was a senior
12 position?

13 A Yes.

14 Q And advanced skills were required?

15 A Yes, which I had.

16 Q Did they ever -- were you ever informed that
17 it -- new position that they were starting?

18 A I asked that in my interview process. I
19 said, "I want to know if this is a new position or if
20 you have a high turnover here." And she said -- Katie
21 said that it was a new position.

22 And when I got to UNC, the people around the
23 floor would say things like, "Oh, that's the revolving
24 door. Katie has gone through several people before
25 you. That office never has the same person for a long

1 period of time."

2 Q But you were told that this -- new
3 position --

4 A From Katie. Katie was the only person that
5 told me it was new position.

6 Q All right. If you could look on page 2,
7 please, under change in responsibilities? Number 5 on
8 page 2.

9 Do you see where it says -- a couple
10 sentences in, it says: the school does not currently
11 have any individuals working at this advanced level of
12 financial modeling and analysis, other than the
13 assistant dean for finance and business; do you see
14 that?

15 A Yeah. I had never seen this description
16 before, but --

17 Q Well, would you agree that -- other than
18 Katie, was there anybody on the finance team that was
19 working at what your level was expected to be working
20 at?

21 A No.

22 Q Okay. So basically, your job was very
23 unique on the finance team, correct?

24 A Correct. Correct.

25 Q Yes. Thank you. And do you recall one of

1 the things that you had input in your application is
2 that you had advanced skills and experience, correct?

3 A Correct. Which I did.

4 Q And you had indicated in there you had
5 "Tableau" -- am I saying that correct? Tableau. How
6 do you say that? Tableau skills?

7 A Correct.

8 Q And in fact, I think you had it in your
9 application that you were an instructor in Tableau
10 when you were at ECU, correct?

11 MS. BATEMAN: I'm going to object
12 because that's not what it says. So that assumes
13 facts not in evidence.

14 MS. JOHNSON: All right. Well, I
15 believe we already read what it said.

16 MS. BATEMAN: Well, if we could go back
17 to what it says.

18 THE WITNESS: That -- I -- I --

19 MS. JOHNSON: Yes.

20 THE WITNESS: I'd like to emphasize
21 that Tableau is a presentation software; it is not a
22 software that uses -- that uses data in the way that
23 it -- you are thinking. You have to manipulate data
24 in Excel and then import it into Tableau. It is a
25 presentation software.

1 And I do have Tableau skills and I
2 created Tableau reports and I would show them to
3 Katie, who admittedly did not know how to use Tableau.

4 The other thing is that in this
5 description it says here that I am going -- I'm -- my
6 description is to give data to the dean, assistant
7 dean for finance, department chairs, and other
8 levels -- senior level leaders.

9 Nobody in that list besides the dean
10 and the assistant dean for finance had a Tableau
11 license. So Katie asked me to please maintain
12 financial models in Excel so that the chairs could
13 actually open the models and look at them.

14 BY MS. JOHNSON:

15 Q And going back to your attorney's question
16 about what specifically you said on your application,
17 you say that -- instructor for tutorials using tools
18 such as Excel, Access, and Tableau to produce more
19 succinct and interactive data for financial decision
20 making.

21 MS. BATEMAN: Can you show her that,
22 please?

23 THE WITNESS: I -- I recognize it, but
24 what I'm trying to tell you is that me being able to
25 show people how to use Excel, Access, and -- and

1 Tableau ten years prior is correct and I could do that
2 when I was at UNC, as well.

3 What I'm trying to explain to you is
4 that nobody else had that access. So I could not -- I
5 can sit around and teach you Excel and Tableau all day
6 long, but they had no ability to access the Tableau
7 workbooks.

8 BY MS. JOHNSON:

9 Q In response to your attorney's request --

10 MS. JOHNSON: Court Reporter, can you
11 please pull up Exhibit 4?

12 THE REPORTER: Sure thing. One moment.
13 What page would you like it at?

14 MS. JOHNSON: This one's not numbered,
15 so that makes it more difficult. I think it's the
16 13th page under the ECU part.

17 THE WITNESS: Yes. I see it and I --

18 BY MS. JOHNSON:

19 Q Yes. Can you just read it? Your
20 attorney -- wants to be accurate. Could you read what
21 it says there; the very last sentence?

22 A Instructor -- tutorial -- tools such as
23 Excel, Access, and Tableau to produce more succinct
24 and interactive data for financial decision making.

25 Q So Ms. Khazanie, you're saying that you're

1 the only person that had access to Tableau?

2 A I'm not saying --

3 Q Is that what you're --

4 A -- only person. I'm saying that the
5 department chairs did not have licenses.

6 Q Katie did, though, right?

7 A Katie did, I believe, as did --

8 Q All right.

9 A And I produced -- several -- several Tableau
10 workbooks.

11 Q But Katie had access, as well, correct?

12 A Yes, I believe so. I never -- I never met
13 with Katie and -- and her logged into Tableau at the
14 same time. I would show her Tableau on my computer.

15 Q Okay. You did discuss your Tableau books,
16 correct, with her?

17 A I tried to show them to her, but she never
18 dug into them.

19 Q Is it your testimony that she never met with
20 you to go over your Tableau books?

21 A Specifically, she never met with me to go
22 over my Tableau books. She would meet with me --

23 Q All right. And --

24 A -- other things and -- at the beginning and
25 I would try to show her work I had done in Tableau.

1 Q And that's your testimony here today?

2 A Correct.

3 Q Okay. So again, do you recall who you
4 interviewed with for the position?

5 A With Katie --

6 Q For your UNC -- do you recall -- go ahead.

7 A I remember Katie. I remember -- I believe
8 her name was Deytia, who was a data -- who was
9 the -- now the dean of the data team. And she did a
10 technical interview on me with technical --

11 Q What does that mean?

12 A They interviewed my technical skills. She
13 asked me specific technical skills about Tableau and
14 Excel with specific -- cases and I answered all of it
15 with flying colors.

16 Q So you did represent that you had Tableau
17 experience, correct? That was your first bullet point
18 core competency that was listed that we had you read
19 out a few minutes ago, correct?

20 A Correct.

21 Q And did you indicate that in your interview
22 process, as well?

23 A Yes. But I would like to emphasize again
24 that Tableau is a presentation software and we
25 primarily -- 90-plus -- 99 percent functioned in

1 Excel.

2 Q So you said Katie and then you said somebody
3 performed a technical interview; do you recall
4 interviewing with anybody else?

5 A Teri Smith. And I don't remember the last
6 person.

7 Q Okay. So there were four people?

8 A I want -- I think there was -- yeah. One
9 more person. I don't remember who it was.

10 Q All right. And how long do you recall the
11 interview lasting?

12 A It had snowed that day and she rescheduled
13 it a couple times. So I don't remember how long it
14 lasted ultimately.

15 Q And it was an in-person interview, correct?

16 A Correct.

17 Q And all of your time at -- so we can be
18 clear on the record. All of your time at UNC was
19 pre-COVID, correct?

20 A Correct.

21 Q Okay. And you were told during the
22 interview what was expected of you and what the duties
23 and responsibilities of the position were going to be,
24 correct?

25 A [No audible response.]

1 Q I'm sorry?

2 A Correct.

3 Q And you were able to ask questions about the
4 job and what was going to be entailed with the job,
5 correct?

6 A Yes.

7 Q And you and Katie -- you eventually got the
8 job, correct?

9 A Correct.

10 Q But there was a little bit of time before
11 you started; you didn't start -- the next week,
12 correct?

13 A Correct. I took a vacation before I
14 started.

15 Q Okay. Did they want you to start earlier
16 but you asked if you could start later because you
17 were going on a vacation or how did that work?

18 A I don't remember the exact conversations of
19 when they wanted me to start.

20 Q Okay. And you understood when you accepted
21 the position that it was a probationary -- it would be
22 probationary for a period of one year, correct?

23 A Correct.

24 Q And you understand that if you're on
25 probation you can be terminated without cause; is that

1 correct?

2 A I do not recall that. I was -- even on my
3 90-day off cycle probationary review, it says that
4 probationary reviews must be completed quarterly,
5 recommended July, October, January, April.

6 And then it says that the supervisor
7 documents at least a paragraph summarizing the
8 employee's performance so far in the cycle. And both
9 the supervisor and employee initial the review.

10 Q Yeah. That's not what I asked you. I asked
11 you, was it your understanding that an employee -- and
12 I'm just asking your understanding. Was it your
13 understanding that an employee on probationary status
14 could be terminated without cause?

15 A I did not understand that. I understood
16 that if anything was a problem, they would discuss it.
17 And then we would -- then there would be action. So I
18 was never given any -- any discussion or documenting
19 of any --

20 Q Well, do you recall signing conditions of
21 employment?

22 A I -- I'm sure I signed something.

23 Q And you were aware that you were going to be
24 on probation for the first year, correct? You've
25 asserted that in your complaint, right?

1 A Correct.

2 Q I'm sorry?

3 A Correct.

4 Q Okay. So do you recall prior to your actual
5 start date that you and Katie actually e-mailed each
6 other about different aspects of working the job?

7 A Yeah. I remember we had some back and forth
8 where I asked her if she wanted me to look over
9 anything before I started just so I could get a head
10 start.

11 Q Do you recall that you asked her about what
12 time the start time for each day was?

13 A I don't remember. I would have to go back
14 and see the exchange.

15 Q Do you recall telling her that you wanted to
16 be able -- did you -- strike that.

17 Do you recall asking her if it was okay if
18 you came in at 9:00 because you were taking a yoga
19 class?

20 A That sounds correct.

21 Q Do you recall telling her -- do you recall
22 asking her about clothes; what you were supposed to
23 wear?

24 A Yes, I do recall that.

25 Q And what do you recall was said?

1 A That I needed to dress up.

2 Q She told you you needed to dress up?

3 A I would have to go back and see the exact
4 e-mail, but yes. She said that I would be in a highly
5 visible role and I would have to be business casual, I
6 think is what she said. But I would have to go back
7 and see the exact wording.

8 Q Were you upset with having to dress business
9 casual?

10 A Absolutely not. I had spent years in -- in
11 finance. I had a closet of suits, so I was fine --

12 Q And that's what you essentially told her,
13 too, right?

14 A Yeah. I was fine with that.

15 MS. JOHNSON: All right. I'd like to
16 pull up Exhibit Number 18, Court Reporter.

17 (Exhibit 18 was marked for
18 identification.)

19 THE REPORTER: Sure thing. One moment.

20 MS. JOHNSON: Thank you.

21 THE REPORTER: You said Exhibit
22 Number 8?

23 MS. JOHNSON: 18. Sorry. 18.

24 THE REPORTER: 18. Okay.

25 MS. JOHNSON: And, Court Reporter, if

1 you can just kind of allow her however much time she
2 needs to read these e-mails.

3 THE WITNESS: Okay.

4 MS. JOHNSON: I think she -- if you
5 just want to -- yeah. Thanks.

6 THE WITNESS: Okay. Yes. Okay. Okay.
7 These all look familiar. Okay. All right. Okay.
8 I've read it.

9 BY MS. JOHNSON:

10 Q Ms. Khazanie, are these at least some of the
11 e-mails that you and Katie exchanged before your
12 actual start date?

13 A Yeah. I think -- they -- they look
14 familiar.

15 Q Okay. And you indicate that -- in terms of
16 start time, you say: I was going to target by 9:00,
17 but let me know if earlier is better, correct?

18 A Correct.

19 Q And then you indicate: I signed up for a
20 21-yoga immersion with my yoga teacher. So 'til the
21 end of the month, I have yoga from 6:00 to 7:30 a.m.
22 By the time I go home, change, and battle I-40, I
23 think 9:00 is what I'm expecting. After that yoga
24 class, I'll try to leave earlier.

25 Is that what you say?

1 A Correct.

2 Q And then she says: if it's okay, let's talk
3 about the report time on your first day. I can be
4 somewhat flexible in January, but there are some
5 critical 8:00 a.m. meetings that you'll need to attend
6 in January, correct?

7 A Correct.

8 Q And you don't dispute that a supervisor has
9 the right to set dress codes and start times; do you?

10 A Correct. And I never once was late for any
11 of those meetings.

12 Q Okay. But you were late to work some;
13 weren't you?

14 A Yes. Because I-40 is very difficult to get
15 down. You don't know when there's going to be an
16 accident.

17 Q Okay. But -- recall having to be counseled
18 about lateness at times, correct?

19 A Yes. And then she also wrote back to me
20 saying, "Supriya, I've seen you change your start
21 times and getting here early and I appreciate it." So
22 as soon as she told me, I corrected it. Immediately
23 left over an hour earlier and she congratulated me on
24 doing it well.

25 Q So just for the record -- so in terms of the

1 school, can you state what the name of the school was
2 that your position was with?

3 A Gillings School of Public Health.

4 Q And am I right that it had different
5 departments in the school?

6 A Correct.

7 Q And do you remember -- what's your best
8 recollection on how many departments they had?

9 A Eight -- eight academic departments.

10 Q And did the departments each have a chair?
11 Is that what you call the head of the department, a
12 chair?

13 A Yes.

14 Q And did the -- each of the departments, did
15 most of them or all of them have a business manager --

16 A Yes.

17 Q -- as well as a chair?

18 A Everyone had a business manager.

19 Q All right. And then is it true that you did
20 not work for one of the departments, correct?

21 A Correct.

22 Q And you were not a business manager,
23 correct?

24 A Correct.

25 Q You worked for what's been called the

1 finance team, correct?

2 A Correct.

3 Q And we've been -- a different description
4 for the finance team is that it was referred to as
5 a -- administrative unit; is that your understanding
6 of what it was?

7 A I -- I think they were counted as part of
8 central administrative unit, correct. They
9 were -- central administrative unit is the -- is just
10 overhead admin for the school.

11 Q Is it your understanding that the IT
12 department was a central administrative unit?

13 A I -- I guess they would be counted in there,
14 yes.

15 Q And how about student affairs; were they a
16 central administrative unit?

17 A Yeah. They -- I mean, these were all
18 non-department --

19 Q Okay. All right. All right. And your job
20 was to work with the departments, correct?

21 A My job was to work with everything.

22 Q But you didn't work with student affairs;
23 did you?

24 A Student affairs did not get a -- did not get
25 an itemized budget; they were part of the overall

1 budget.

2 Q But you didn't have to work with them in
3 terms of presenting to them or they didn't go to your
4 finance meetings or presentations, correct?

5 A Correct.

6 Q All right. And IT didn't go
7 to -- presentations or financial meetings either; did
8 they?

9 A Sometimes the IT team did come to the
10 meetings.

11 Q All right. But your supervisor was Kate,
12 correct?

13 A Katie.

14 Q Right. The business managers and chairs
15 were not your supervisors, correct?

16 A Correct.

17 Q And the IT department for personnel and
18 student affairs were not your supervisors, correct?

19 A Correct.

20 Q All right. You did not report to them from
21 an employment standpoint; did you?

22 A No.

23 Q All right. Can you describe -- what do you
24 recall about the finance team; who made up the finance
25 team?

1 A There were five people. Teri Smith.

2 Q Do you recall what her role was?

3 A She was senior accountant at the time.

4 Q And I'm asking you because your case
5 involves discrimination claims, what's your -- of what
6 Teri Smith's -- what she identified as her race?

7 A White female.

8 Q Okay. And then who else worked for the
9 finance team?

10 A Kate Allison.

11 Q And what was her position?

12 A I -- I don't -- some sort of accountant.
13 Junior accountant or accountant.

14 Q Okay. And what's your understanding of what
15 race she identified with?

16 A Female.

17 Q And then who else worked there?

18 A Adriana Shephard.

19 Q And do you recall what her position was?

20 A Some sort of accountant. I don't remember
21 what her title was.

22 Q And do you -- what race did she identify
23 with to your knowledge?

24 A I'm not sure if it was white or Hispanic.

25 Q All right. Well, you wouldn't -- would you

1 dispute if she identified as non-white?

2 A No. Because she might -- I don't know if
3 she goes by Hispanic white or Hispanic non-white.

4 Q Do you know where she was born?

5 A I want to say possibly somewhere in South
6 America, but I'm not sure.

7 Q Did she have an accent when you talked with
8 her?

9 A What do you mean by "did she have an
10 accent"?

11 Q You know, an accent. When some people have
12 accents -- non-English speaking -- did she have a
13 non-English speaking accent? Could you detect any
14 accent when you talked with her? Foreign accent.

15 A I think that's a discriminating question,
16 but yeah --

17 Q Well, we're talking about --

18 A Yes.

19 Q Okay. You could? So was there anybody else
20 on your team besides Katie?

21 A No.

22 Q And the people you just indicated? So there
23 were two women of color on your team, correct?

24 A If Adriana --

25 Q Adriana and you --

1 A If she identified as --

2 Q -- correct?

3 A Yes. If she identified as that.

4 Q Okay. So of the four people that worked for
5 Katie, two were women of color, correct?

6 A If Adriana identifies, then yes.

7 Q Okay. All right. And what was your working
8 relationship with Teri Smith?

9 A She was one of the accountants on the team,
10 but she often would come to me for help with Excel.
11 So I --

12 Q Did you have a good relationship?

13 A I thought I had a really good relationship
14 with Teri and she would always come to me and ask me
15 if I could teach her new tricks. And if I did
16 something that was helpful for her, she would come in
17 with a pen and paper and then write notes about it.
18 And she kept a file on her computer that was called
19 Excel tips and -- Supriya's Excel tips and tricks.

20 Q Um ...

21 A And she --

22 Q Go ahead. Sorry. I apologize.

23 A She frequently praised how -- my -- how much
24 my tricks were helping -- be more efficient --

25 Q Your Excel tricks?

1 A Correct.

2 Q Now, you never did any work directly for
3 Teri, though, other --

4 A I didn't work with -- no. I only worked
5 with Katie on the team. I didn't work with --

6 Q Okay. Okay. So no one else on the team
7 reviewed your -- correct?

8 A No. But they often would ask me for help
9 with technical issues that they were having and I
10 would help them come up with quick ways of doing their
11 work.

12 Q Did you ever refer to Teri Smith as your
13 work mom?

14 A Possibly, yes.

15 Q And what would you mean by "work mom"?

16 A She was very close to me, she would ask me
17 how I'm doing, she would come in and hug me. She
18 would -- she was just very friendly -- extremely
19 friendly.

20 Q And what was your relationship -- how would
21 you describe your relationship with Kate Allison?

22 A Kate and I were friends on the team and she
23 and I would walk to our cars together and she would
24 come in and tell me how things were going in her life.
25 And she -- we had a good working relationship.

1 Q And how about with Adriana?

2 A We did not speak as often. She -- she
3 would -- she worked very long hours, as well.
4 And -- but we didn't speak in as much depth as I did
5 with Kate and Teri.

6 Q Did everybody in the department -- excuse
7 me -- on the finance team work long hours?

8 A Yes. Katie was very -- very strict about us
9 working a lot. She kind of -- she wanted us to be
10 there in-person all the time. We were the only group
11 that never left early on Fridays. We were always
12 there 'til 5:30 and later. And Katie was known to be
13 very tough and make sure that the whole team was there
14 more than the -- 40 hours a week.

15 I believe Kate Allison was limited on how
16 many hours she was allowed to work. So she would
17 leave after she hit 40.

18 Q Well, as a professional, there are times
19 when you have to work more than 40 hours a week,
20 right?

21 A And I had no problem with that.

22 Q I mean, even if you're a state employee,
23 correct?

24 A Correct. And I don't think anyone was
25 disputing whether or not we would work over 40 hours

1 sometimes, but that cuts both ways. And sometimes if
2 you have worked 'til 7 o'clock the night before or
3 8:30 the night before, it's -- would be nice to leave
4 the next day at 4:30 instead of 5:30 again.

5 Q But that was a practice for the entire time,
6 correct? Not just you. In terms of being expected to
7 work a full day and try to get the work done, correct?

8 A I -- I don't think anyone was questioning
9 whether or not we were working full days.

10 Q Okay. So everybody was working with the
11 same criteria in terms of the hours and times they
12 were working, right?

13 A I -- yeah -- every -- everyone on Katie's
14 team worked more hours than other people on the floor.

15 Q Okay. But you're the only group that was
16 the finance team, right?

17 A Correct.

18 Q And you had a lot of work, correct?

19 A That I had a lot of work? Yes, I did.

20 Q Yeah. The whole team -- the finance team,
21 it was a busy place, right?

22 A Yes.

23 Q And there were a lot of people expecting
24 things from you guys at all times, correct?

25 A Correct.

1 Q And would it be fair to say that if a
2 department chair wanted something now, they wanted it
3 now; not later?

4 A And I always provided it.

5 Q And would it be fair to say that being on
6 the finance team and reporting about all the things
7 y'all reported about that accuracy was incredibly
8 important?

9 A Yes. And I was always very accurate.

10 Q So would you agree, Ms. Khazanie, that your
11 position was a unique position on the finance team
12 itself, correct? You had a position that none of the
13 other women on the finance team had, correct?

14 A Correct.

15 Q And then you would agree that everyone in
16 the finance team, including yourself, had jobs that
17 were unique from everybody else in the school,
18 correct?

19 A They were different, yes.

20 Q All right. You and the business managers,
21 for example, didn't have the same responsibilities and
22 duties, correct?

23 A Correct.

24 Q All right. And are you aware that you were
25 the highest paid person on the finance team but for

1 Katie?

2 A Yes. 'Cause I had access to -- to financial
3 data --

4 Q And because -- you were the highest paid
5 because you were a senior level employee, correct? A
6 senior financial analyst, correct?

7 A Correct.

8 Q And the whole time was made up of -- I guess
9 I'll call females, correct?

10 A Correct.

11 Q There were no males on the team?

12 A No.

13 Q And I think we indicated before that as
14 of -- the team below Katie, 50 percent of them were
15 diverse, correct?

16 A If Adriana identifies as non-white, yes.

17 Q And do you know why she wouldn't identify as
18 a non-white?

19 A Because I have friends that are Hispanic
20 that identify as white.

21 Q Can you describe the layout of the floor
22 where you worked? Well, first of all, what
23 floor -- were you in a building? Was the school
24 self-contained in one building?

25 A Yes.

1 Q And then what floor were you on?

2 A I was on the second floor. And my
3 office -- Katie had an office and it was -- I'm
4 looking at the -- it was 207 A Rosenau Hall.
5 Two-oh -- suite 207.

6 Q And so she had an office; did you have an
7 office?

8 A I did.

9 Q Was it an office or a cubicle; how did that
10 work?

11 A I had my own office.

12 Q And where was it located in connection with
13 Katie's office?

14 A We shared a wall.

15 Q So was it right next door is what you're
16 saying?

17 A Yes. Yes.

18 Q Your offices were side by side?

19 A Yes.

20 Q Were they in a little suite together or were
21 they just down a long hall? Does that make sense?

22 A It was -- it was a suite. Both Teri and
23 Adriana had cubicles. And Kate shared an office with
24 somebody from HR and I had my own independent office.

25 Q Okay. And again, were you the closest

1 physically to Katie than anybody else on the finance
2 team?

3 A No, Teri was closer. Teri -- Teri --

4 Q Physically closer?

5 A Teri's cubicle was next to Katie's door.

6 Q But you were within steps of her office,
7 correct?

8 A Correct. But both of our offices --

9 Q Side by --

10 A -- had a door.

11 Q Okay. All right. And when you were working
12 in the office -- there were a lot of times when you
13 were both working in your offices at the same time,
14 correct?

15 A Correct.

16 Q And you were able to speak with Katie unless
17 she was otherwise occupied, correct?

18 A At first, that is true. After -- after July
19 or whenever Todd Nicolet left the School of Public
20 Health, Katie would often work from home for long
21 periods of time; weeks at a time. And Katie, when she
22 was in the office, would close her door and not open
23 it for anybody.

24 Q But my question was, you did have access to
25 her when she was there and she was not otherwise

1 occupied, correct?

2 A Incorrect. When she would come into the
3 office, she would often have a clear schedule, a clear
4 calendar, but have her door closed and not answer
5 anybody. So she was not --

6 Q And I want to talk a little bit more about
7 this later, but while you're on it right now let me
8 just make sure I understand. You're saying that you
9 never got to talk with Katie in the office after Todd
10 Nicolet left; never?

11 A I did not say never. I'm saying that many
12 times she would be in the office, but keep her door
13 closed the full day and not answer anybody.

14 Q But there were times when you were able to
15 talk to her when she was in the office, correct?

16 A Sometimes.

17 Q After Todd -- okay.

18 A Sometimes; not always.

19 Q All right. Sometimes you had official
20 meetings with her, correct, that y'all would schedule
21 and you would meet with her officially, correct, on a
22 scheduled time?

23 A Not frequently, but occasionally.

24 Q But it occurred, right?

25 A It occurred --

1 Q And then there -- go ahead.

2 A No, you go ahead.

3 Q How many times do you think you guys had
4 official meetings where you scheduled them in advance
5 from July on?

6 A There were months where I did not talk to
7 her for an entire month. And there were months where
8 I would talk to her once a week or once every other
9 week. But official meetings did not happen for weeks
10 at a time.

11 I did not have formal meetings with her
12 from -- I would have to give you -- I would need to
13 look at my calendar to -- to be able to tell you. But
14 we did not have formal meetings towards the end of
15 the -- of my time there.

16 Q And when you say towards the end, what do
17 you mean?

18 A Towards the end of my employment at UNC.

19 Q Well, how many formal meetings do you think
20 you had with her that were scheduled in advance from
21 July on?

22 A Maybe six. Six to eight. I don't know
23 exactly.

24 Q And you recall, do you not, that you were
25 gone on a two-week vacation in October?

1 A Correct.

2 Q And then she took a week vacation right
3 after you, correct?

4 A I don't recall her vacation, but that sounds
5 possible.

6 Q So there were three weeks during the fall
7 when y'all were both on vacation, correct?

8 A I remember my vacation.

9 Q All right. Do you remember her mom being
10 sick at times during your employment?

11 A I remember her mother getting a knee
12 replacement surgery and Teri coming to me asking if we
13 would -- if I would give \$20.00 to buy her a gift and
14 I did.

15 Q Do you recall Katie having to be out some to
16 take care of her mother?

17 A I only recall her knee being -- her knee
18 being replaced.

19 Q You don't recall any conversations with
20 Katie about how her mom was doing?

21 A Her mom was not sick to my knowledge; her
22 mom had a knee replacement surgery early in the year.

23 Q And she needed assistance from Katie, right?

24 A At the beginning of the year; not towards
25 the end of the year. And as I said, Teri Smith asked

1 if I would give \$20.00 to buy her a gift for her
2 mother and I said, "Okay." And I gave \$20.00 and
3 they -- we sent her a gift basket of some sort. And
4 this is not --

5 Q And are you upset about that?

6 A No. I just want to say that there was
7 no -- I want to put it in the record that I was kind
8 to Katie and her mother.

9 Q And she was kind to you; wasn't she? At
10 times, at least?

11 A At the beginning of the time there, she was.
12 And then she completely changed her tune.

13 Q When according to you did she change her
14 tune, like, when in the course of your employment?

15 A After Todd Nicolet left and she didn't have
16 any supervision.

17 Q Can you just tell -- and I just want this to
18 be very general because obviously we're not financial
19 people or accountants. Can you just describe to me
20 what projects you did and how they sort of changed
21 over the course of the year? Like was there something
22 you were working on initially and so on? Can you just
23 sort of give me an overview of your projects?

24 A There was one -- the big project that I did
25 was an allocation model. Prior to -- allocation

1 model, the way that Katie explained to me that
2 departments got their funding was that they would each
3 go to Barbara Rimer and lobby her for funds.

4 And they -- "they" meaning Todd Nicolet
5 and -- and Katie and others wanted to create a more
6 fact-based system of how money was going to be
7 allotted to each department.

8 So I created a model that used the inputs of
9 school-based tuition -- how many hours taught and how
10 many full-time students were enrolled and created a
11 hybrid that based on the amount of teaching and
12 students you have in your department would allocate
13 the amount of funding that would go to each
14 department. And I created --

15 Q So --

16 A The other model --

17 Q So let me just ask you about that. Is that
18 generally referred to as the allocation model? I'm
19 just trying to -- so we can try to speak some of the
20 same language here?

21 A Yes, that's the allocation model.

22 Q All right. And Todd and Katie helped you
23 with that project, correct? You didn't do it
24 completely alone, correct?

25 A I would meet with Todd and Katie and they

1 would tell me what they wanted and then I had to
2 create it.

3 Q And how long did that project last?

4 A That project lasted most of the year that I
5 was there. There were over 38 versions of that model.
6 So they -- it was an iterative process that we
7 would -- I would make a version of it and then we
8 would go to a meeting and present it and then they
9 would ask for changes.

10 And then I would meet with each of the
11 department chairs and their business manager
12 separately and go through and explain things to them
13 and talk to them about it. And Katie and Todd and
14 Barbara Rimer in those meetings would present what we
15 had done.

16 And Katie and Barbara Rimer and Todd were
17 very impressed with the model. At the end of
18 presenting it, I received applause from all of the
19 department chairs. And everyone was praising how
20 amazing I was doing and how helpful the model was.

21 Q And Katie and Todd reviewed your work,
22 correct, during that project? I mean, they would have
23 to, correct?

24 A They did. And that was the
25 beginning -- that -- those first few versions were at

1 the beginning of the year and even when these models
2 were sent out to department chairs, Katie would end
3 the e-mail with "many thanks to Supriya for all her
4 hard work on this."

5 Q Giving you credit, in fact, for your work,
6 correct? So how long -- so did that take up -- like
7 I'm trying to get an idea, again, in terms of you were
8 there for almost a year. So how long was the
9 allocation model, the focus of your work -- was it
10 a -- focus until July? I think we've seen --

11 A It was -- it was a continuous focus with
12 Katie saying to me "I'm really dropping the
13 ball" -- "ball on training you." And there was
14 another model I was supposed to make called the MPH
15 UNC model, which Todd really wanted to push on. Katie
16 was not as keen as pushing on it.

17 And I started creating that model and wanted
18 to have meetings about it and then Katie canceled the
19 meetings for MPH at UNC. And then there was another
20 set of meetings and that was a --

21 Q Wait. Let me ask you -- oh, okay. Go
22 ahead. Sorry.

23 A There was another model I was working on for
24 a compensation analysis, which Katie also suspended
25 the meetings of that. And I have the e-mails where

1 she says that she wants to put those meetings on
2 hiatus.

3 Q Did you give those e-mails to your attorneys
4 to produce in discovery?

5 A I did.

6 Q Okay. So the MPH UNC model, when did you
7 get assigned or start working on that?

8 A I don't remember the exact dates. I don't
9 have access to my e-mails.

10 Q Okay. And then would it be after the
11 allocation model?

12 A It was during the allocation model, but my
13 emphasis was almost entirely on the -- allocation
14 model. It was --

15 Q And you're saying -- oh, sorry. You and
16 Katie, you're saying y'all never met about the MPH UNC
17 model?

18 A No. We didn't meet on -- we didn't present
19 it formally to the group because Katie did not want to
20 keep going with it. Katie said she was working on
21 budgets. I don't remember exactly when this was.
22 Sometime in September -- August or September, Katie
23 spent two or three weeks working from home.

24 Q So she as a supervisor, though, has a right
25 to decide which projects are going to get prioritized

1 when, correct?

2 A She can decide whatever, but I was
3 producing -- even -- even though she did not want to
4 work on it anymore, I was constantly creating models
5 on the side. I would come up with different views in
6 Tableau of what kind of drivers were causing increases
7 in tuition; what was causing attrition.

8 I created Tableau stories on the side. I
9 was showing -- I was showing different ways of
10 presenting the data. I have all of those models that
11 I would send her. Like, "Hey. I had a great idea for
12 something," and I would make a model for it and send
13 it to her.

14 Q But you were sending her models on projects
15 that she had indicated she didn't want to work on?

16 A No. I was sending her more models on top of
17 the allocation model, which I thought would be another
18 way of -- like as you showed in my job description
19 that I was supposed to give advanced ways of looking
20 at data. I was really trying to show her different
21 ways of looking at data and I would create financial
22 models that would present the data differently.

23 Q So other than the allocation model -- here's
24 where I'm trying to get an idea. And you've mentioned
25 an MPH UNC model, which I understand was assigned to

1 you for a period of time but then tabled. What other
2 projects were assigned to you while you were at UNC
3 besides those two?

4 A I -- that's -- I think we are talking past
5 each other here because I would create models for
6 Katie, like, I created departmental explanations of
7 how -- of how funding was being used and I created
8 a -- a -- another model that shows how -- tuition was
9 being used.

10 I created -- she didn't give me other
11 objectives that she wanted me to complete. So I
12 completed everything she gave me and then some.

13 Q So you're saying she didn't assign specific
14 projects to you or tell you tasks to do?

15 A Correct. She would not give me more things
16 to do, so I would give her more information and I
17 would create more data and more projects.

18 And I would e-mail them to her and I
19 said -- I even have an e-mail where I say to her that
20 I've built out the fully allocated -- updated
21 allocation model with new census numbers. "I finished
22 a Q1 report ahead of schedule; could you please review
23 it?" She did not review it.

24 Q Are you looking at e-mails right now?

25 A I'm looking at a -- at some notes I had

1 taken -- I did a fifteen -- I did a -- a ten
2 interactive page Tableau story with four data sheets
3 each. It's a 15 year view into the school's use of
4 school-based tuition; it had 15 years of student
5 headcounts, full-time enrollment, all calculated by
6 hand.

7 And that was because Katie would give me the
8 information I asked her for in PDF format and it
9 couldn't be calculated. I compared revenue generated
10 by school-based tuition to headcounts, student aid
11 that was dispersed versus enrollment, how much faculty
12 salary was being paid by department and by year out of
13 the school-based tuition. And any other --

14 Q And were these projects she assigned to you?

15 A She did not tell me what she wanted from
16 Tableau. So I wanted to give her more data. She
17 said, "All Barbara wants is data." And I said, "Well,
18 then let me give you data."

19 And I would -- I made the story, I made the
20 Tableau -- Tableau, when you put together large
21 amounts of information, it is a page and then
22 those -- page feeds into what can be called a Tableau
23 story, which pieces together different information.

24 Each one of these stories has four -- had
25 four data inputs. So I had to do 40 pages of data to

1 clean this up. And I created a -- input ten-page
2 Tableau story that gave all of this data. And
3 she -- I tried to show it to her several times in
4 December and I worked on this for weeks because she
5 was not giving me other assignments.

6 So I had completed all the work she gave me
7 and I did this Tableau story and I tried to show it to
8 her. And one time she came into my office and she
9 said, "Oh, Barbara won't like this. I know what
10 Barbara wants."

11 Q So is it your position -- so my question
12 was -- and I just want to make sure we're clear on
13 this -- what projects you got assigned. And I think
14 you --

15 A She did not assign me more -- anything that
16 she assigned me I completed and I would give it back
17 to her.

18 Q Well, the only projects you've actually
19 identified are the allocation project and then this
20 MPH project; what other projects do you recall that
21 she specifically assigned to you?

22 A She wanted me to do a Q1 -- she wanted me to
23 do quarterly reports and I did the quarterly reports.

24 Q Okay. Any other projects that you can
25 recall that she specifically assigned you?

1 A She told me to -- she would go to department
2 chair meetings and promise them -- promise them
3 detailed explanations of what -- what money they were
4 getting; it was called a departmental walk. And she
5 said, "I told them I would have it in the next two
6 weeks," she said, "but I don't plan on working" -- "I
7 don't" -- "I don't plan on giving them anything."

8 But I wasn't sure -- and I said to her, I
9 said, "Do you want me to create them?" And she said,
10 "Yes. But I'm not going to give it to them for a few
11 weeks." And that happened in -- that happened in
12 November.

13 And she said -- she -- I -- she -- on
14 November 14, she promised the department crosswalks of
15 their budgets within the next two weeks. She told me
16 after the meeting she was not even going to think
17 about the department budgets until after Thanksgiving
18 despite having promised them in two weeks.

19 So I completed all of those departmental
20 budgets and I completed the walks. Because she had
21 promised them to the chairs and therefore I felt that
22 it was my responsibility to have those prepared for
23 her. Whenever she -- give it to the chairs.

24 Q When did you say -- you said there came a
25 time where she stopped giving you assignments; when

1 did that start? When was that time?

2 A In the fall she stopped giving me
3 specific --

4 Q Well, what month? What month? Because you
5 were gone for two weeks in October and she was gone
6 for one week in October. But what time in the fall
7 are you saying she stopped giving you assignments?

8 A On September 18, I sent Katie 13 Excel
9 workbooks to review and I created 5 Tableau workbooks.
10 The e-mail transmitting these documents was -- was
11 sent in my evidence. And I never received any
12 feedback from her regarding this work product.

13 Q Well, didn't y'all meet on the 19th or 20th?

14 A But she didn't talk to me about what I sent
15 her.

16 Q All right. What'd y'all talk about, then?

17 A I don't recall the exact meeting --

18 Q Okay. But you met very shortly with her
19 right after that e-mail, correct?

20 A I do not remember meeting with her in -- in
21 November.

22 Q It was September. You just said September.

23 A October -- you -- you just said that
24 in -- in October we were gone --

25 Q You just said you sent her an e-mail on

1 September 17 or 18 and that --

2 A Yes. I sent her --

3 Q -- you didn't get feedback --

4 A I sent -- yeah. On September 18, I sent her
5 that e-mail. And then on October 4 I said, "Hi,
6 Katie. I'm glad you're taking a much needed day off.
7 I've been working independently for the past few
8 months, especially since the allocation model wrapped
9 up. With Todd no longer here, I haven't had quite the
10 same structure where I was working towards delivery
11 dates.

12 "Though I know this is valuable information
13 that I'm gaining currently, I would like to have a
14 little bit more review and guidance so that I can have
15 some goals and specific product" -- "projects to work
16 towards.

17 "I understand that you have been drowning in
18 deadlines, but I would like to propose that we have
19 weekly standing meetings where we review what I'm
20 working on similar to what you're currently doing with
21 Laura [ph].

22 "I'd also like to create a roadmap of sorts
23 so that I can create personal checkpoints for myself.
24 I know I have potential to provide a lot of value with
25 models and financial information and I'm currently a

1 little stuck 'cause I don't know what's coming up.

2 "I am on vacation starting Thursday and I
3 know you're out when I get back. If we could start
4 having meetings in November, I'd really appreciate it.
5 Best, Supriya."

6 Q And you met with her right after that,
7 correct?

8 A When I returned from vacation, Katie was not
9 in the office, which I was aware of before --

10 Q So you met with her before -- did you not
11 meet with her before you left for vacation?

12 A I sent that e-mail before I left for
13 vacation. So no, I didn't --

14 Q You sent that e-mail on October 4; you left
15 for vacation on October 10, right? Or the night of
16 the 10th.

17 A Yes.

18 Q You worked on the 10th, correct?

19 A On the 10th, I independently finished
20 another assignment and asked Katie for review prior to
21 leaving for -- on vacation that evening. She did not
22 schedule any time with me on her calendar and she kept
23 her door closed and blocked off her calendar. I left
24 for vacation with --

25 Q So let me ask --

1 A -- my work done -- with all of my work done
2 and my timesheets submitted.

3 Q Is it your testimony under oath that you did
4 not meet with Katie after your September 18 e-mail,
5 that you did not -- are you saying under oath that you
6 did not meet with her on the 18th or 19th or 20th of
7 September?

8 A I do not -- I do not remember which day I
9 spent with her -- which time I met with her, but she
10 did not go over my -- my -- those workbooks that I
11 sent her.

12 Q Okay. And are you saying that she did not
13 respond to your October 4 e-mail?

14 A Correct.

15 MS. JOHNSON: Okay. All right. So
16 we've been going now -- 1:11. We've been going for
17 another hour since our last break. So I do have a
18 couple more hours of questioning. And so I want to be
19 fair to everybody. I would like to take a 15-minute
20 lunch break.

21 We're all, I think, in our own homes or
22 locations. I just need to eat a quick little bite.
23 And my preference would be to take a very short break
24 and then continue on so that we can finish up in a
25 reasonable time on a Friday afternoon.

1 But obviously, if people need to take
2 longer than a few minutes, I'm open to whatever the
3 group suggests.

4 Valerie? You have your head in your
5 hand. You're on mute. You're on mute. There you go.

6 MS. BATEMAN: Yeah. Why don't we
7 discuss logistics off the record?

8 MS. JOHNSON: Okay. Yeah. Let's go
9 off the record.

10 THE REPORTER: Sure thing. The time is
11 1:12 p.m.; we are now off the record.

12 (Off the record.)

13 THE REPORTER: The time on the monitor
14 is 1:40 p.m.; we are now back on the record.

15 MS. JOHNSON: Thanks, everyone, for
16 letting me take that short break.

17 BY MS. JOHNSON:

18 Q Ms. Khazanie, I want to move on in just a
19 second to your claims in this case and get information
20 about your claims. But I just want to follow-up on
21 one or two quick things that we discussed right before
22 our lunch break.

23 There was a period of time that you
24 said -- I think you said an entire month where Katie,
25 you said, did not come into the office; what time

1 period was that again?

2 A She -- for a few weeks she did not come into
3 the office. I --

4 Q When was that?

5 A Budget season. I don't remember exactly
6 when it was. Probably September.

7 Q Okay. So you're saying in --

8 A In the fall sometime she was at home for
9 more than two weeks or three -- it was over two weeks
10 she did not --

11 Q At the same time continuously is what you're
12 saying?

13 A [No audible response.]

14 Q Okay. And your vacation was a two-week
15 vacation in October; was it October -- started on the
16 10th; is that right? Or you worked the 10th, correct?

17 A I -- I was on vacation from the
18 10th -- yeah. I worked the 10th and I was on vacation
19 from end of the 10th through the 27th.

20 Q And then so was that a Friday? Did you
21 return on the 29th of October?

22 A I -- I returned from vacation on the 28th.

23 Q And do you know -- and you may not -- was
24 that a Saturday or -- when did you return to work,
25 like, what day did you actually return to work, the

1 28th?

2 A It would have to be that Monday.

3 Q Okay. All right. That's what I was
4 wondering. So when you were at work, did you have
5 your own -- did they provide a computer to you?

6 A They provided me with a computer, yes.

7 Q All right. And then did you ever bring your
8 computer home?

9 A Yes --

10 Q What were your --

11 A -- day.

12 Q You would bring your computer home almost
13 every day?

14 A Mm-hmm.

15 Q Okay. And did you also have access to a
16 phone, a landline?

17 A Yes.

18 Q Did y'all use landlines back then or --

19 A Not very often.

20 Q Would you also have your personal phone with
21 you during the workday?

22 A Yes.

23 Q Now, you denied in your discovery responses
24 that you did online shopping during the work hours; is
25 that right?

1 A I --

2 MS. BATEMAN: Can you show her the
3 response, Kari?

4 MS. JOHNSON: It was a request for
5 admission. If you could, Court Reporter, pull up
6 Exhibit Number twenty -- excuse me. It's 2.

7 THE REPORTER: Sure thing. One moment.

8 MS. BATEMAN: I mean, I'd be super
9 surprised if anybody denied doing online shopping.

10 MS. JOHNSON: I'm going to object if
11 you're trying to answer the question.

12 MS. BATEMAN: No. I just want you to
13 show her what the question and the response were.

14 MS. JOHNSON: Hold on. Let me find it.

15 THE REPORTER: I have it up on the
16 screen now. What page do you need me to go to?

17 MS. JOHNSON: Yeah. Hold on. Let me
18 find -- so the first part of Exhibit 2 is the
19 supplemental responses. Further on down, what should
20 be back there is plaintiff's responses to defendants'
21 first requests for admission.

22 Sorry. It's taking me a second to find
23 it.

24 Oh, okay. Actually, the very last
25 question. So if you can go to the second to the last

1 page? All right.

2 BY MS. JOHNSON:

3 Q Question number 34 says: admit that you
4 spent an excessive time at work engaged in non-work
5 activities, including but not limited to online
6 shopping and asking coworkers to take photos of your
7 outfits while you were employed with the university.
8 And you answered "denied," correct?

9 A Correct.

10 Q Is that your position that you did not spend
11 an excessive -- time at work engaged in activities
12 such as online shopping?

13 A Correct.

14 Q Do you recall asking Teri Smith to take
15 pictures of your work outfits, the outfit of the day,
16 to send to your mom?

17 A It was not a daily thing. There were a
18 handful of outfits that I wore that were my mother's
19 clothes, so I asked her to take a picture so I could
20 send my mother a picture of me wearing a dress that
21 she wore in the '80s.

22 Q So do you recall how many times you asked
23 Teri to take pictures of what you were wearing?

24 A I do not recall how many times, but it was
25 almost always a dress that was my mother's.

1 Q Okay. I mean --

2 A And as --

3 Q -- was it more than five times --

4 A -- just now, it was outfits to send to my
5 mom because they were hers.

6 Q Was it more than five times throughout the
7 year?

8 A I -- probably about five.

9 Q Okay. Were there times when you would go
10 down and talk with the people in the IT department
11 about non-work matters?

12 A They were very friendly, nice guys. Yes.

13 Q And -- there times when you went to student
14 affairs -- spend a lot of time in the student affairs
15 department?

16 A I would not say a lot of time, but I did
17 confide in them that -- that Katie was bullying --

18 Q Are you aware that people complained about
19 the amount of time you were spending in other offices
20 with their employees?

21 A I -- that was never memorialized or said to
22 me.

23 Q Well, you were -- in your complaint, you say
24 that Katie, you say, criticized you for socializing
25 too much. So she did mention to you --

1 A Yes --

2 Q -- about socializing, correct?

3 A -- mentioned it to me, but I did not know
4 that other people complained is what your question
5 was.

6 Q Okay. All right. And you would agree that
7 a supervisor, if -- complaints of that nature, has a
8 right to address those, correct?

9 A Correct. But I -- I was not given that
10 feedback --

11 Q Well, you state in your complaint that you
12 were told that you were socializing and not at your
13 desk too much, correct?

14 A Yeah. And then I changed that after she
15 told me.

16 Q Okay. So --

17 MS. JOHNSON: I'm sorry. Valerie, did
18 you say something?

19 MS. BATEMAN: I did not.

20 MS. JOHNSON: Oh, okay. Sorry. I
21 thought I heard you say something.

22 If we could, Court Reporter, pull up
23 Exhibit 7?

24 (Exhibit 7 was marked for
25 identification.)

1 THE REPORTER: Sure thing. One moment.

2 BY MS. JOHNSON:

3 Q Ms. "Khazanie" --

4 MS. BATEMAN: Khazanie. Khazanie.

5 MS. JOHNSON: Khazanie. I just -- at
6 least I'm recognizing now when I do that.

7 BY MS. JOHNSON:

8 Q Ms. Khazanie, I apologize for that.

9 Ms. Khazanie, Exhibit Number 7 is the charge of
10 discrimination which your attorney has used as an
11 exhibit in some of the depositions that she's taken.

12 MS. JOHNSON: Court Reporter, if you
13 can just scroll down as much time as Ms. Khazanie
14 needs.

15 THE WITNESS: You can go to the next
16 page. Yes. You can keep going. Okay. Okay.

17 Yes, I recognize this.

18 BY MS. JOHNSON:

19 Q Okay. And, Ms. Khazanie, does that EEOC
20 charge -- well, first of all, did anybody help you
21 prepare that?

22 A Yes, Valerie.

23 Q Okay. And does that EEOC charge of
24 discrimination -- does that accurately summarize the
25 actions and conduct that you complain about in this

1 case -- support of your discrimination claims?

2 A Correct.

3 Q All right.

4 MS. JOHNSON: And then if you could
5 pull up, Court Reporter, Exhibit Number 8.

6 (Exhibit 8 was marked for
7 identification.)

8 THE REPORTER: Sure thing. One moment.

9 BY MS. JOHNSON:

10 Q And while he's doing that, I'll tell you
11 that Exhibit Number 8 is your SHRA grievance that you
12 filed with UNC.

13 A Yes. I recognize this, as well.

14 Q And when was the last time you reviewed
15 that?

16 A I looked over parts of it last night.

17 Q Okay. And when was the last time you looked
18 at Exhibit 7 -- EEOC charge of discrimination?

19 A Probably a week or so ago.

20 Q All right. And between the two documents,
21 do they accurately describe the -- and allegations
22 that form the basis for your discrimination claim in
23 this case?

24 A Yes.

25 Q All right. Is there anything you've left

1 out of these documents -- an allegation or --

2 A I -- I'd really -- I -- I'm -- I'm really
3 upset about how much retaliation is coming here. And
4 I -- I am frustrated that because I went to Charletta
5 and I went to Steve and I went to Janet and I told
6 them how I was feeling -- and if I get emotional, I'm
7 sorry.

8 But I told them how I was feeling. I told
9 them what she said to me. I told them that she made
10 comments about "oh, when a man comes to your office,
11 you take your hair down for them." I told them how
12 she told me -- she blasted to everybody that I was
13 taking a yoga class and singled me out for coming in
14 at 9:15 instead of 9:00.

15 I told them she makes me uncomfortable and
16 makes these comments about how I eat too much and how
17 I am overly social and it was bullying. It was -- and
18 I'm -- I'm trying not to cry here, Kari, but it was
19 bullying. That is not how a supervisor speaks to
20 their employee. It is not.

21 And when I came forward and told the people
22 in power, who were supposed to protect me by the State
23 Human Rights Act, their response was not to protect
24 me, but to go and tell her. And how is that not a
25 clear cut case of retaliation? I don't --

1 Q Okay. And --

2 A I don't understand. And I want that -- I
3 really -- the harassment that she said towards me,
4 the -- the comments she made towards me about how I
5 eat and how my hair looks and what I'm dressing
6 and -- these are not -- this is harassment.

7 Q Okay. And my question is -- and I don't
8 mean to make you cry. I'm just, you know, this is my
9 one opportunity to talk to you about your claims. But
10 I just -- my question was -- and I definitely want to
11 talk to you in a few minutes about -- interactions
12 with the HR people.

13 But in terms of what you're saying about
14 Katie Thornsward, is the conduct that you're
15 complaining of -- is it all contained in Exhibit 7 and
16 8?

17 A The main --

18 Q Is there anything --

19 A -- are. There -- there -- I will not say
20 that there is -- that I have memorialized one year of
21 misconduct in one 18-page document. There were
22 definitely --

23 Q So as we --

24 A Every -- all of the highlights are here.

25 But --

1 Q Okay. Sorry. We're having that remote
2 Geico commercial over and over again. I apologize.

3 Is there anything, though -- I mean, this is
4 my one chance to ask you questions. Is there anything
5 that you know of as you sit here today regarding your
6 allegations against Katie Thornsvarð -- and we'll talk
7 later about HR -- that are not contained in 7 and 8?

8 A Retaliation by Katie Thornsvarð.

9 Q Okay. All right. And the
10 retaliation -- what are you saying was the
11 retaliation?

12 A That -- when I went to Steve and Steve told
13 me to talk to Katie and I talked to Katie directly and
14 I said, you know, "When you said that about my hair,
15 it really upset me. And I talked to Steve and he told
16 me to tell you directly." And -- said, "I already
17 self-reported that."

18 And she knew that I had talked to Steve.
19 And she knew -- from what I understand, Charletta told
20 her that I also spoke to Charletta. So she was
21 getting -- Katie was getting direct feed that I
22 confided in people and told them that she was
23 bullying. So Katie --

24 Q So did --

25 A Katie knew and Katie retaliated.

1 Q But what specific conduct are you saying was
2 retaliation?

3 A Firing me.

4 Q Okay. So when you talked to Katie on
5 November-- do you remember when you -- did you and
6 Katie, was your conversation on November 4, 2019?

7 A I don't remember which date I had the
8 conversation with her. It was at the beginning of
9 November sometime.

10 Q And can you tell me, was that a good
11 conversation?

12 A I -- I wouldn't say it was a good
13 conversation considering that afterwards she became
14 more difficult to work with.

15 Q Well, what can you tell me about the
16 conversation? I mean --

17 A I don't recall -- I am under oath and I
18 don't recall the exact wording she used in the
19 conversation. But I was always -- and one of the
20 things that she criticizes me about is that I was too
21 friendly. So I smiled and I was kind and I said to
22 her, I was like, "You know, it really upset me when
23 you did this. It really hurt my feelings."

24 I did not get upset. I did not show any
25 anger. I told her -- so was it a good meeting? I

1 only tried to have good meetings with her. I was
2 never anything but kind. And she would say things to
3 me like "your" -- "my Excel skills are here, but yours
4 are here" and she would hold her hand above her head
5 and say how strong I was.

6 And I would take the compliments and I was
7 nothing but nice. So if you ask me whether the
8 conversation was good, it's not like she would be
9 hateful to my face. The way --

10 Q Did you feel better --

11 A Did I feel better? No. I went to the
12 bathroom and cried.

13 Q Okay. So if we could just pull up --

14 A Because --

15 Q Go ahead.

16 A Because she never said sorry. Katie never
17 said sorry for any of the things she did.

18 MS. JOHNSON: Can we just pull up
19 Exhibit Number 17?

20 (Exhibit 17 was marked for
21 identification.)

22 THE REPORTER: Sure thing. One moment.

23 BY MS. JOHNSON:

24 Q Do you recall, Ms. Khazanie, e-mailing Katie
25 the day following your conversation? Do you recall

1 this e-mail where you say "just wanted to say thank
2 you for talking with me yesterday. I really
3 appreciated it"?

4 A I don't recall this, but I might've sent it
5 just to try and smooth things over. Notice that I
6 initiated the conversation; not her.

7 Q That's right. You did initiate it and you
8 thanked her, correct?

9 A To try and keep things professional because
10 I complained about her and she knew I did.

11 Q All right. And then she responds: of
12 course. I'm here to support you and you should always
13 feel like you can come talk to me about concerns,
14 correct?

15 A Yes. Yes. And then after me going to her
16 and I was trying to smooth things over and confirm
17 that I was okay telling her that I was uncomfortable,
18 this then led to me being fired. Do you -- this is
19 clear cut discrimination that I go to her and tell her
20 how I feel. I then send her an e-mail
21 saying -- allowing me to tell you how I feel.

22 She confirms that she's here to support me
23 and then she fires me. I -- if --

24 Q Ms. Khazanie --

25 A -- and where she says: I'm here to support

1 you and you should always feel like you can talk to me
2 about concerns -- so when I -- when I ask her -- when
3 I have established here that I have an open
4 relationship with her, that she can -- she and I can
5 talk to each other, then why over the course of my 360
6 or 50-something day employment did she not feel that
7 she could come to me directly and tell me just as
8 openly as I shared with her that "hey, you are not
9 performing and we're going to fire you"?

10 She could've had an adult conversation the
11 same way that I had an adult conversation with her and
12 she could have expressed concerns with me the way I
13 did with her. And she could have said to me,
14 "Supriya, these are the things" -- "need to
15 improve" -- and then we -- move ahead the way I did.

16 Q Well, let me just -- I want to talk a little
17 bit more about the --

18 MS. JOHNSON: But if you can, Court
19 Reporter --

20 BY MS. JOHNSON:

21 Q I just want ask you a few more questions
22 about your charges here.

23 MS. JOHNSON: Exhibit Number 7. If you
24 could pull up Exhibit Number 7?

25 THE REPORTER: Sure thing. One moment.

1 BY MS. JOHNSON:

2 Q I want to just ask you a couple specific
3 questions and I'll kind of go through the whole thing.

4 MS. JOHNSON: But, Court Reporter, if
5 you could go to the allegations? It's on the second
6 page.

7 BY MS. JOHNSON:

8 Q And in the first paragraph, you say: from
9 January to July when Nicolet was her supervisor, Katie
10 met with me regularly. So you would agree that from
11 January to July Katie met with you regularly, correct?

12 A Correct.

13 Q And then you say: I was told that Katie had
14 fired several employees; who told you that?

15 A Multiple people in the department -- in
16 the -- in the --

17 Q Who?

18 A -- on the floor.

19 Q Do you recall names?

20 A I do not recall names.

21 Q Do you recall any names of the people who
22 were allegedly terminated?

23 A No, I don't. I know there was --

24 Q Do you know --

25 A -- held my office before I was there. And I

1 don't remember her name, but she -- I used to get
2 phone calls on my landline for her. And another
3 thing.

4 Q Do you know what race the person before you
5 identified with?

6 A White, I believe. I don't know.

7 Q So in the third paragraph where you're
8 talking about training you say: months rolled by, but
9 I never got meetings to be trained on the university
10 financial systems of how to pull data. Is
11 that -- testimony?

12 A She did not train me, so then I -- I found
13 training that was given by the university office and I
14 registered on my own.

15 Q Okay. But it -- training that was provided
16 to you when you got there, correct?

17 A Not when I first got there; it was taken
18 later. And Katie did not -- Katie did not find this
19 training for me; I found it myself.

20 Q So nobody from the university helped
21 you -- training at first?

22 A No, I found that training. Because I went
23 to UNC, so I knew where to find it.

24 Q Okay. And it says: I was completely
25 self-taught; is that correct?

1 A On university systems, on how to pull data,
2 on -- on how things worked, yes. I would have to come
3 up with -- graphs on my own. She did not train me.
4 And she even said "I'm really dropping the ball on
5 training you."

6 Q And you also talk about a person named
7 Latasha -- say she was given no training by Katie?

8 A Latasha started right around the same time
9 as another woman named Laura [ph]. Laura [ph] was
10 white; Latasha was black. Laura [ph] got weekly one
11 on one meetings with Katie; Latasha did not.

12 Q Now, did Latasha ever complain to you?

13 A No.

14 Q Did Latasha give you permission to complain
15 on her behalf?

16 A No. This is an observation I made.

17 Q All right. Do you know what Latasha's prior
18 history with UNC was?

19 A I do not know Latasha's work history.

20 Q All right. And for the record, Latasha was
21 not par THE OFFICER: the finance team, correct?

22 A No, she was in another department.

23 Q She was a business manager, correct?

24 A As was Laura [ph].

25 Q But they were in different departments,

1 correct?

2 A They were different departments, but they
3 had the same role in different departments. They were
4 both the business manager --

5 Q Are you aware --

6 A -- for different --

7 Q Are you aware that -- sorry. We're doing it
8 again. Are you aware that Latasha had been a business
9 manager or in a comparable position in another larger
10 department before she came to the Gillings School?

11 A I don't know Latasha's history.

12 Q Okay. But yet you're using her as your
13 comparator for this lawsuit, correct?

14 A That's what is written there. Because I was
15 not given weekly trainings the way Laura [ph] was.

16 Q All right. You and Laura [ph] had different
17 positions, correct?

18 A But Laura [ph] did not report to Katie.
19 Laura [ph] was much further removed from Katie than I
20 was. And I --

21 Q Was Laura [ph] hired -- go ahead.

22 Was Laura [ph] hired as an advanced senior
23 analyst?

24 A I don't know what Laura [ph] was hired as
25 besides the title of business manager. But Laura [ph]

1 did not report to Katie; Laura [ph] was in a different
2 department. And she took priority of training
3 Laura [ph] over her own people; me being her own
4 person.

5 Q So what you're saying here, though, is that
6 Katie gave Latasha more training than Laura [ph],
7 correct?

8 A I'm saying that gave Laura [ph] more
9 training than Latasha. Vice versa of what you just
10 said.

11 Q You're saying Katie -- I probably said it
12 wrong. What you're saying in your suit is that Katie
13 provided Laura [ph], the white business manager, more
14 training than Latasha, a woman of color business
15 manager, correct?

16 A Correct.

17 Q But again, you don't know what their prior
18 histories were with UNC?

19 A No. But at the same -- at the same period
20 of hiring, within the few months of -- and having very
21 similar titles, Katie did -- Katie was going above and
22 beyond to train Laura [ph], who did not report into
23 her -- she had no need to take her under her wing.

24 Q Do you know if Katie and Latasha discussed
25 or sent e-mails to each other about -- weekly meetings

1 were needed?

2 A I -- I do not know that. And I -- I'd also
3 like to go back to your question where you said the
4 revolving door of my office. When -- when I first
5 started at the team in January, Katie said that it was
6 the first time she had a fully staffed -- where she
7 could depend on -- get work done.

8 She said, "I was always consumed with
9 dealing with" -- "issues with my staff that I never
10 got anything done."

11 Q So I want to stay kind of focused on the
12 questions I'm asking you, Ms. Khazanie. And I just
13 want to, you know, you've --

14 A I -- I did not -- yeah. I do not know
15 what -- what conversations Katie might have had via
16 e-mail to Latasha. But from -- optic standpoint and
17 what all of us saw -- "us" meaning the people in our
18 office -- she took time aside to train Laura [ph]
19 regularly and did not afford me the same -- the same
20 grace. She did not give me weekly trainings.

21 If she had time for Laura [ph] in a
22 different department that didn't report to her, she
23 should've had time for me.

24 Q So when you say "we," who else are you
25 including in that?

1 A Other people in finance. No -- Kate, Teri,
2 and myself did not get weekly meetings with her. We
3 did not have check -- on a weekly basis the way
4 Laura [ph] did.

5 Q Did they complain to you about that,
6 Adriana, Teri, and --

7 A Teri and -- Teri and --

8 Q -- to you about --

9 A -- on occasion had said, "Yeah. She never
10 has time for us." I don't -- they said that. I don't
11 remember. But they had said that "she doesn't have
12 time for us." And she never had time for me after
13 Todd left. "Never" meaning I did not get standing
14 once a week meetings.

15 Q All right. And you were not a business
16 manager, though; were you?

17 A No. But as you stated already, I was closer
18 to her than a business manager. Business managers
19 weren't in our department.

20 Q But you were hired as a senior financial
21 analyst, correct?

22 A Correct.

23 Q And let me just finish up this conversation
24 about Latasha. Would it surprise you to know that
25 Latasha e-mailed her and said weekly meetings were no

1 longer necessary?

2 A I -- that's fine. I don't have any -- I
3 don't know what their conversations were.

4 Q Okay. But you put all this in your lawsuit.
5 I'm just asking you, do you have any other information
6 about disparities that you're claiming between Latasha
7 and the other business manager that was receiving
8 training?

9 A Yeah. I -- not have any more information.

10 Q Okay. All right. And then so -- all right.

11 MS. JOHNSON: And if you could go to
12 page -- let's see. Scroll down to the next page.

13 BY MS. JOHNSON:

14 Q And I'm not going to go through this whole
15 thing. You say in June when -- you see that paragraph
16 that starts "in June, when Katie" --

17 A Yes.

18 Q -- "returned, she told me that she had heard
19 I was 'goofing off' while she was out."

20 A Yes.

21 Q Do you dispute that other people had
22 reported and made complaints about --

23 A When I -- when I asked her who said that,
24 she could not give me an answer. And when I -- when I
25 said to her, "If I were goofing off, how was I able to

1 provide you with 12 new workbooks?" And she didn't
2 have an answer --

3 Q But you dispute that other people complained
4 to her that it did not appear that you were working?

5 A I do not know what other people said to her,
6 but I believe that Katie might have created this; that
7 no one really told her this and she was just
8 attempting to upset and criticize me.

9 MS. JOHNSON: Okay. And if you go down
10 to the -- oh, sorry. I'm getting a little bit of
11 feedback. That's why I think y'all are saying things.

12 If you go back down, Court Reporter, to
13 the very end, the very last sentence on this page?

14 BY MS. JOHNSON:

15 Q It says "she even sent me to 'emotional
16 intelligence' training"?

17 A Yes.

18 Q And is that part of your claim here that you
19 got sent to emotional intelligence training?

20 A Yes. I feel that she was trying to single
21 me out for having an outgoing personality.

22 Q Okay. All right. Did you actually -- she
23 recommended, in fact, during your quarterly review in
24 March that you attend this training, correct?

25 A Correct.

1 Q And it was a two-day training, two separate
2 days, correct?

3 A No, it was one training.

4 Q Isn't it true, Ms. Khazanie, that it was two
5 days and you just didn't go to the second day?

6 A I do not recall it being two days. It was a
7 one-time training.

8 Q Okay. All right. We will -- I'll show you
9 some documentation about that in a minute. I want to
10 just -- well, I want to try to streamline this and
11 just go -- up on the exhibits I have up.

12 In the next sentence that starts "also in
13 July," you're talking about the diversity comment --

14 A Yes.

15 Q -- that Teri made?

16 A Yeah.

17 Q Now, Katie did not make that comment,
18 correct?

19 A Correct. I did not say that Katie made it.

20 Q And it was made during a meeting that was
21 talking about diversity, right?

22 A What have we done for diversity was the
23 question. And she said, "We hired Supriya."

24 Q And you state in here Katie -- later down
25 you say that Teri apologized to you, correct?

1 A Correct.

2 Q And you state in here that Katie walked the
3 comments back and told the group that you were the
4 most qualified applicant, correct?

5 A Correct.

6 Q And do you recall telling Caitlin Webster
7 that you felt like it -- that you were happy and
8 satisfied with how that matter was resolved?

9 A I don't remember that conversation with
10 Caitlin, but I didn't want to keep a grudge
11 against -- against Teri for it.

12 Q Okay. And are you aware that Katie made
13 Teri go to bias training or some sort of diversity
14 training after that and because of that?

15 A I am not aware of that.

16 Q All right. And would you agree that Katie
17 made y'all do -- or suggested and encouraged y'all to
18 do diversity training while you were there?

19 A Katie -- I would not say that she suggested
20 it. Katie -- Katie -- I asked if I could go to Safe
21 Zone training. She said okay, but she made it
22 very -- for us to actually get these trainings.
23 It's -- it's good to -- it's good to say that we can
24 take trainings, but then not supporting your employees
25 to actually go get them is a very different story.

1 Q So are you saying she didn't encourage her
2 team members to go to diversity training?

3 A I do. Because on our outside wall where you
4 put -- not you are a Safe Zone and in HAVEN
5 training -- that did that.

6 Q Okay. But there was other diversity
7 training, correct?

8 A There were other diversity trainings that
9 the university provided, yes.

10 Q And she encouraged her team members to go to
11 those, correct?

12 A She never actually let people go.

13 Q Okay. All right. Going further down, you
14 say you requested to take a vacation in September but
15 you weren't -- she didn't want you to -- in September.
16 You were allowed to take a two-week vacation in
17 October, right?

18 A I tried to go in -- I tried to take the
19 vacation -- I asked for the vacation in September. I
20 had accrued seventy -- you probably have the document
21 more -- than we do. I had accrued -- how many hours
22 was it?

23 She denied me from taking vacation
24 for -- some very small, like, 41-minute difference
25 between two weeks and -- between two weeks and -- I

1 don't have the exact hours. You might have that
2 there.

3 Q So my question was, you were able to take a
4 two-week vacation in October, correct?

5 A Yes. But I had asked if I could take it in
6 September and I had 79 hours and change, so 79 hours
7 and a few minutes, accrued and she would not let me
8 take two weeks because she said I was 41 minutes short
9 on the accrual. So I had to wait until the next pay
10 period where I would accrue over 80 hours. That was a
11 41-minute difference.

12 Q Do you know of anybody else who took -- and
13 did you -- your vacation, was it two weeks back to
14 back?

15 A Yes.

16 Q Did anyone else while you were there take a
17 two-week back to back vacation?

18 A Not that I know of, no.

19 Q So then if you scroll on down, you talk
20 about the August e-mail about the yoga classes?

21 A Correct.

22 Q And I meant to ask you this earlier. What
23 religion do you identify with?

24 A I'm Hindu.

25 Q Okay. And you never formally made a request

1 for religious accommodations through the university's
2 official request process; did you?

3 A I didn't know that there was a special
4 request process for religion.

5 Q Okay. But at one point time you asked her
6 about this coming later for the -- you wanted to go to
7 a yoga workshop that you associated with religion,
8 correct?

9 A Correct. It was at my temple.

10 Q And it looks like you would be coming in
11 around 9:30, correct?

12 A Correct.

13 Q And you would agree that that was later than
14 other people were coming in, correct?

15 A It was later, but then I promised to stay
16 later in the day and make up that time. And I told
17 her that if I have any important meetings or if
18 there's anything in the morning I will skip class that
19 day.

20 Q And then you state on the next page --

21 MS. JOHNSON: Court Reporter, if we
22 could go to the next page?

23 BY MS. JOHNSON:

24 Q You say: I was upset that she shared this
25 personal information with everyone and made it

1 everyone's business, right?

2 A Correct.

3 Q You were mad at her for sending out the
4 e-mail where she was telling people that you'll be
5 coming in late, correct?

6 A Yeah. I didn't think it was necessary to
7 tell everybody that I was doing something personal.

8 Q Did she ask your permission before she sent
9 her e-mail out?

10 A No, she did not.

11 Q Okay. All right. And then if you go down,
12 you say on September 18 you sent her the workbooks,
13 which I believe that's what you were testifying to
14 earlier about, correct?

15 A Yes. And I -- I'd also like to get on the
16 record that in that same paragraph where I talk about
17 how she sent out the e-mail, Kate Allison came to me
18 in confidence, "I wish Katie didn't make me tell
19 everyone that I have to go see a therapist." So she
20 singled out people. She was bullying people. And
21 that's not okay -- by HIPAA standards to tell everyone
22 that somebody's going to a therapist.

23 Q And what race is -- is it Kate; is that who
24 you're talking about? Kate?

25 A Yes.

1 Q What race is Kate?

2 A White female -- harassment.

3 Q So if you go down to -- I believe that's
4 what you were talking about earlier about your 13
5 Excel workbooks that you talked about earlier?

6 A Correct.

7 Q And then you said: I never received
8 feedback. And then I recall asking you didn't you
9 meet on either that 19th or 20th; do you recall if
10 y'all met?

11 A I do not recall.

12 Q Okay. And then the next thing you have on
13 this charge: on October 4, I wrote an e-mail to Katie
14 asking for more guidance. And I believe right before
15 we broke for lunch you testified that she didn't
16 respond to that e-mail, correct?

17 A She didn't respond with meeting times.

18 Q Okay. She didn't respond with a meeting
19 time?

20 A With -- I said: I would like to have weekly
21 standing meetings where we review what I'm working on,
22 similar to what you're doing with Laura [ph]. I'd
23 also like to create a roadmap of sorts and create
24 personal checkpoints for myself. I didn't get any of
25 that.

1 Q All right.

2 MS. JOHNSON: And then if you go to the
3 next page?

4 BY MS. JOHNSON:

5 Q And again, I'm just trying to ask you -- I'm
6 jumping, but I'm trying to just ask you -- from this
7 exhibit so that we don't have to jump back and forth
8 from exhibits.

9 When you say -- you're talking about when
10 you went to talk -- Janet Scarce about the hair
11 comments, right?

12 A Correct.

13 Q And you state here: I begged her please not
14 to make a big deal out of it if it would get me in
15 trouble, correct?

16 A Correct.

17 Q All right. You --

18 A If it would get me in trouble, which it did.
19 It -- I was retaliated against.

20 Q And you're saying you also talked to Steve
21 Ragan at the beginning of November?

22 A Some point in the beginning of November,
23 yes --

24 Q -- recall putting --

25 A What?

1 Q Do you recall putting in one document that
2 you talked to him on November 1?

3 A I don't remember the exact time. I don't
4 remember if one document said that, but I do know that
5 it was around the beginning of November. And --

6 Q And you're saying that you talked about
7 Katie with him at that time?

8 A Yes. I told him that I -- he said, "Just
9 talk to her and tell her how you feel." And we've
10 been over this that then I did tell her how I felt and
11 then I wrote her an e-mail saying "thanks for letting
12 me talk to you" and then that was held against me. I
13 100 percent feel that she was -- that me going to
14 Steve added to her retaliating against me.

15 MS. JOHNSON: And so if we could just
16 pull up Exhibit Number 8?

17 THE REPORTER: Sure thing. One moment.

18 MS. JOHNSON: Thank you. And then,
19 Court Reporter, when you get it up if you could just
20 again let her scroll through to where she feels
21 comfortable that she's familiar with it.

22 BY MS. JOHNSON:

23 Q I think you may already have done this,
24 Ms. Khazanie. It's the SHRA grievance with UNC.

25 A Okay.

1 Q In this particular document, Ms. Khazanie,
2 you have a part that says allegations of harassment;
3 it's on the fifth page.

4 A Mm-hmm.

5 MS. JOHNSON: Court Reporter, if you
6 could scroll to the fifth page?

7 BY MS. JOHNSON:

8 Q Okay. So for -- and this charge, isn't it
9 true, Ms. Khazanie, you list out what your sexual
10 harassment allegations are and then your allegations
11 separately of your allegations of discrimination,
12 correct?

13 A Yes.

14 Q And then you -- hostile work -- I believe
15 you have other grievable issues, hostile work
16 environment, correct?

17 A Correct.

18 Q All right. And then for the sexual
19 harassment part, you've talked about the hair comment,
20 correct?

21 A Correct.

22 Q And then you talk about the food comments,
23 correct?

24 A Correct.

25 Q And then for the hair comment, I just wanted

1 to ask you about that. What was the hair comment for
2 the record; what do you recall her saying to you?

3 A Michael Kosorok, who was one of the
4 department chairs, came to my office and he asked me
5 if he could come in and go through the model. I said,
6 "Sure." He asked if he could pull up a chair next to
7 me. I said, "Sure." He sat next to me for two hours.
8 The door was wide open.

9 He asked me -- and once I went through it,
10 he said, "In 14 years at this school, I've never seen
11 anyone so knowledgeable and thorough. You are the
12 best hire this department has made." And I laughed
13 and I was like, "You should tell my boss that." And
14 he goes, "I plan to. This is incredible work."

15 And then later that day when Katie was
16 passing by in front of my office, I told her -- I
17 said, "The meeting with him" -- "with Dr. Kosorok went
18 really well" -- and she started giggling. She
19 goes -- she goes, "I've noticed whenever a
20 man" -- "men come into your office you take your hair
21 down for them."

22 And I said, "Excuse me?" I said, "That's
23 completely untrue." And she said, "Well, I've noticed
24 it." And then she just walked away. And I ran to the
25 bathroom and I cried 'cause it was very mean.

1 'Cause she was insinuating that -- I -- I
2 don't even know what she was trying to -- that I was
3 wearing my hair down for -- for male colleagues?
4 Like, it was just -- it was just ridiculous.

5 Q Was that the only time she ever made a
6 comment about your hair like that; the only one you've
7 mentioned?

8 A That's the comment about my hair. But she
9 made comments about my eating and how I have no
10 self-control -- lacking willpower all the time, like,
11 so many times I --

12 Q Okay. And I'll ask you about that --

13 A -- that is the one --

14 Q Do you recall when she made that comment?
15 You say June 6, but is it possible it was earlier?

16 A It was after the meeting with Dr. Kosorok,
17 so whenever the meeting with Dr. Kosorok happened, it
18 was that day.

19 Q Okay. All right. And you didn't bring it
20 up with Janet Scarce until September, correct?

21 A Because I was terrified. How are you --

22 Q And you didn't --

23 A What -- what I don't understand about this
24 whole process is that I was afraid to tell anybody
25 about what she was doing because I was afraid they

1 would retaliate. And then finally when I got up the
2 courage to go and tell them that she was doing this,
3 they retaliated, like exactly what I feared would
4 happen is what happened. Why wouldn't --

5 Q Well, do you --

6 A -- come forward --

7 A Do you know when she self-reported it? Do
8 you know when she self-reported it to Steve?

9 A I do not. 'Cause I -- I'm not even truly
10 sure -- I don't know. I don't know if she herself
11 reported it after Steve told her that I reported it or
12 if she did it on her own accord.

13 Q Well, if -- months and months before, you're
14 saying that she somehow retaliated against you months
15 and months later?

16 A Yes. I feel that she was building -- if
17 my -- my question is if her accusations of me are
18 correct, that -- lack of competence, low work output,
19 unable to work independently, and inability to
20 recognize inaccuracies.

21 Up 'til the, like, July and -- and around
22 that time where I am saying this, "Supriya has amazing
23 technical skills" is what she would say.

24 I -- and this is written in my -- my
25 review: I'm very pleased with the work she is doing.

1 She has very advanced Excel skills and has done a
2 great job utilizing those skills to structure a model
3 that is flexible and can be modified on the fly. She
4 is very analytical and I like the way she works
5 through issues and challenges in her work. She is
6 extremely generous in sharing her knowledge and
7 expertise with her teammates.

8 These are the comments she was giving -- to
9 me before. And --

10 Q Are you reading --

11 A -- I --

12 Q Ms. Khazanie, for the record, are you
13 reading from your probationary review; your quarterly
14 review?

15 A Yes.

16 Q Does she also state in there: she has not
17 found the right balance between work and social time
18 during the workday; she needs to cut down on
19 socializing and --

20 A Yes. I -- that is --

21 Q -- make sure she --

22 A Yes. And that is -- that is the last thing
23 she wrote in there. And then I went for that -- for
24 that training. And this was written to me -- away, in
25 March. When -- on July -- virtual connectivity

1 interruption -- on June -- July 16, Katie sent me an
2 e-mail saying: I just wanted to let you know Barbara,
3 the dean, said you are amazing.

4 The next day, she elaborated and told me
5 that the deans are so impressed with me and the work
6 I'm doing. And I said, "My dad, who used" -- "a
7 director at ECU thought my probation was up this week
8 'cause I hit six months." And she said, "Well, I'm a
9 very direct person. If you had any problems at all, I
10 would have you in my office by now. You're doing
11 great work; tell your dad I said that." And --

12 Q So on --

13 A -- then -- said, "You know, once you become
14 permanent, it doesn't mean we can't get rid of you; it
15 just makes it a little bit harder." So she -- she was
16 upfront and honest with me or so she said that if
17 there were any problems that still existed, she would
18 let me know. And she did not let me know.

19 Q All right. Ms. Khazanie, I feel like we're
20 kind of jumping -- we were talking about the hair
21 comment and then you started reading from the
22 probationary review -- I mean, excuse me -- your
23 quarterly review.

24 Isn't it true, though, that she said also in
25 your quarterly review "she has not found the

1 right -- between work and social time during the
2 workday. She needs to cut down on socializing and
3 make sure she is putting a full day of work," correct?
4 Did she say that?

5 A She did.

6 Q And she also says: she needs to develop
7 more self-awareness regarding her interactions with
8 others and how her comments and contributions to
9 conversations are being perceived, correct?

10 A Yes.

11 Q Then she goes on to say: I'm very happy to
12 have Supriya on my team. And then says: she has
13 great potential to contribute to the school in very
14 meaningful ways, correct?

15 A Correct.

16 Q And then she says: I am excited about the
17 ways she's going to help us elevate our financial data
18 delivery, especially through Tableau, correct?

19 A Correct.

20 Q And then if you look over at the overall
21 comments later on the review, she says: Supriya needs
22 to work on her communication skills, correct?

23 A Correct. But what I would like to respond
24 to that is that that was --

25 Q Well, I'm just asking you --

1 A That happened in March -- the date on this
2 is a review from 1/14/19 to 3/31/19.

3 Q Right. And then if you look, she says at
4 the very bottom: information analysis and decision
5 making -- this is what it says; does it not -- it
6 says: Supriya is new and learning how to pull data of
7 the financial systems, how to clean the data, and how
8 to include appropriately in various analyses.

9 The more she works with the data and she
10 sees how I review and adjust her analyses she will
11 become proficient in this area. I would expect within
12 six to nine months that she will be self-sufficient in
13 analysis and use of financial data.

14 Is that not stated in there?

15 A I don't see that, but I can pull it up.

16 MS. JOHNSON: I tell you what, Court
17 Reporter, can you make Exhibit Number 10 an
18 exhibit -- I mean, can you show Exhibit Number 10?

19 THE WITNESS: I -- I see it here. I
20 have it.

21 BY MS. JOHNSON:

22 Q Okay. And that's what's stated at the end
23 is that it was her hope that over the next six to nine
24 months you were going to become self-sufficient,
25 correct?

1 A And I was self-sufficient.

2 Q Well, in October you're writing her saying:
3 I need more guidance and weekly structure and more
4 structure and weekly --

5 A -- she was not giving me projects. She was
6 not giving me enough projects that she had delivered.

7 Q All right. Well, you state what you state
8 in that October 4 e-mail. The e-mail speaks for
9 itself; would you agree?

10 A I think that you are mixing two issues.
11 Because I wanted to have more projects like the
12 allocation model that we would take to chairs and take
13 to deans make decisions off of. I say in that e-mail
14 that as -- now that we are, you know, we are wrapping
15 up the -- the allocation model, I don't have the same
16 structure. I don't have --

17 Q So going back to Exhibit 8 -- we've sort of
18 got off my exhibit here. Going back to Exhibit 8,
19 which is your UNC SHRA charge. I'm just going to
20 finish up with this exhibit before we move on. So for
21 the sexual harassment, you list the hair comment,
22 which we've talked about. And then you list that she
23 made fun of you about food.

24 And you state in there that you became so
25 self-conscious after that that you couldn't eat unless

1 you closed the door; is that correct?

2 A Yeah. I generally kept it a little -- I
3 didn't shut the door; I would close it a little bit so
4 I could eat without her making comments about it.

5 Q Okay. And you never made suggestions about
6 everyone eating together throughout -- rest of your
7 employment there?

8 A I would ask if anyone wants to go get lunch.

9 Q But if you were so self-conscious, why would
10 you organize team lunches that included Katie?

11 A To keep some team camaraderie.

12 Q Okay. So there were times, then, where you
13 didn't eat in your office by yourself and that you
14 initiated lunches with everybody, correct?

15 A Yeah. Because I didn't want her to
16 completely crush my spirit.

17 Q Okay. And then on your charge, then you go
18 to allegations of discrimination. And one of
19 them -- the very first thing you list is unfounded
20 criticisms for being happy and lacking emotional
21 intelligence. And that's where we were talking about
22 before -- we've already discussed that -- where you
23 talk about she made you go to the emotional
24 intelligence training, correct?

25 A Correct. Yes.

1 Q And again, were you aware that others had
2 complained?

3 A Only from what she said.

4 Q All right. Did you ever -- did you refer
5 to -- during your very first lunch there, did you tell
6 everybody at lunch about your sexual harassment at
7 your prior job?

8 A I don't remember. I'm sure I was very happy
9 to be away from it.

10 Q Do you remember referring to white male
11 jerks during that lunch?

12 A I do not remember.

13 Q Do you remember Katie telling you, "We don't
14 make generalizations like that" or we shouldn't?

15 A I -- I don't remember that conversation. I
16 don't recall.

17 Q Are you denying that it occurred?

18 A I'm not denying it. I am -- I don't recall.

19 Q Do you ever recall making a comment that
20 white people don't eat mangos?

21 A I do not.

22 Q Do you recall talking a lot about lack of
23 wokeness at UNC?

24 A I would believe that that's something I
25 might have said, but I don't remember saying that.

1 No. I might've said it.

2 Q Do you know that if it got to the extent
3 where it bothered people how much you were talking
4 about it?

5 A I wish people would have that conversation
6 with me directly.

7 Q Do you know whether or not these
8 conversations were interrupting other peoples' ability
9 to work?

10 A I -- again, I wish somebody would've come to
11 me directly and had a mature conversation.

12 Q Well, did you ever -- let me ask -- this, do
13 you recall making a herpes comment at like a
14 retirement or birthday gathering at work?

15 A That conversation I do recall. That was
16 somebody's -- somebody had a birthday -- birthday
17 something -- birthday cake, I think, was being cut.
18 And they were talking about glitter bombs.

19 And I -- my sister -- who is an MD-MPH, with
20 a MPH from UNC no less -- had said to me that one of
21 the funniest things that they heard was that glitter
22 was the herpes of childhood and how it was considered
23 a funny public health joke.

24 And when somebody talked about
25 making -- giving -- giving glitter bombs, I said, "You

1 know, I heard this really funny joke from my sister
2 that herpes" -- "that glitter is the herpes of
3 childhood." And I thought it was a really witty,
4 funny thing that was a public health joke.

5 And one person said, "Well, we are a public
6 health school" and he laughed, but other people did
7 not laugh. And --

8 Q Do you recall -- you just said you wished
9 people would've had the courage to talk to you; do you
10 recall Steve Ragan talking to you about that comment
11 afterwards?

12 A Yes. And then I told him I felt bad about
13 it and I will do better next time.

14 Q And you agree that a supervisor has a right
15 to deal with complaints and concerns that other people
16 raise about their direct reports, correct?

17 A Correct.

18 Q Do you ever recall using the N word when you
19 were talking to people in the IT department?

20 A Yes. I was explaining to Joseph and Melvin
21 about how my high school had people that said the N
22 word and I used the N word in the description. And I
23 said, "It was really shocking to me that they still
24 used it." And Joseph replied to me and said, "You
25 know, we usually don't even say it." And Joseph is

1 a -- is a -- an African American male.

2 He said, "We don't say it usually; we just
3 say the N word." And I said to him -- I was like, "I
4 am so sorry. I didn't mean to use it for anything
5 other than how shocking it was that my high school
6 teacher would still use it when explaining it and not
7 use the term 'the N word.' But I really apologize if
8 it hurt your feelings."

9 And he said, "Oh. It's" --

10 Q So --

11 A And he said to me --

12 Q Sorry.

13 A -- "oh, it's fine." And he was not upset
14 with me.

15 Q Do you recall if other people overhearing
16 that conversation found it disturbing?

17 A I know that Brent [ph] was in the room and I
18 am aware from my attorney that he went to HR. But
19 what is --

20 Q And I don't want to hear anything that
21 you've learned from your attorney --

22 A Well, what -- what I want to say is that
23 both -- both -- I talked to both Melvin and Joseph,
24 who were the two black men in the room when I said
25 this, and I apologized to them and they said, "We

1 don't mind. It's fine."

2 Q Do you ever recall telling Steve Ragan that
3 your emotional intelligence training was a waste of
4 time?

5 A I -- I'm sure I did because I
6 didn't -- emotional intelligence training was about
7 having the courage to overcome shyness and talk to
8 somebody, including one of the things that they -- in
9 that training was that if you see a cute baby in a
10 grocery store, you should feel confident enough to go
11 up to the person and say, "I think your baby is cute."

12 And I found it completely counter to what
13 Katie was citing that I was too social.

14 Q But you didn't go to the second day of the
15 training -- you?

16 A I don't know why you keep saying "second day
17 of the training." I was to go to a training and I
18 went to the training. I do not know about -- second
19 day of training. It was a -- it was not even a full
20 day of training; it was a short hour to maybe two-hour
21 short training at AOB -- administrative office
22 building.

23 Q So for your discrimination claim, you talk
24 about unfounded -- the emotional intelligence and then
25 you talked about the diversity hire comment, which

1 we've already talked about. And then you talk about
2 "being unavailable for me and another person of color"
3 and we've already talked about Latasha, right?

4 A Okay.

5 Q Correct? And so being unavailable to you,
6 it is true -- first of all, you stated in your other
7 charge that you and Katie met regularly through July,
8 correct?

9 A 'Til July.

10 Q And then you did have some official
11 meetings, correct, after July that were scheduled in
12 advanced?

13 A A couple here and there, yes.

14 Q Okay. And then you had some training -- you
15 did get training at UNC, correct? Some official
16 training, correct?

17 A Correct.

18 Q Do you remember the names of any of the
19 training you got?

20 A No, I don't.

21 Q And you would also have meetings where you
22 would just -- there were times where she would at
23 least talk to you in the office, correct?

24 A I mean, our offices were next to each other,
25 so yes. I saw her sometimes.

1 Q And then you also e-mailed each other about
2 work a lot, correct?

3 A I would try to catch her via e-mail, yes.

4 Q And she reviewed your work and y'all did
5 presentations together, correct?

6 A We did not -- she did not review much of the
7 work I gave her after August or -- July or August. I
8 sent her countless -- countless reports and Tableau
9 stories and Excel workbooks that we never went over.

10 Q All right. But she did review some of your
11 work, correct?

12 A None of the meaningful outputs. She would
13 give --

14 Q All right.

15 A Yeah. She would not --

16 Q She would have to review your work before
17 she did a presentation, correct?

18 A Yes. And she would use the work for her
19 presentations.

20 Q Yeah. So she would have to review it. I
21 mean, Katie's not the type of person that's just going
22 to go in and give a presentation without -- the work,
23 right?

24 A I -- she -- she would take my work and use
25 it to present, but she did not speak to me about it.

1 Q Okay. All right.

2 A The thing is that you just said that Katie
3 would use my work to present, but part of the reason
4 that I was fired was a low work output, lack of
5 competence, and inability recognize inaccuracies. And
6 she -- you just stated "she used your work to
7 present."

8 So if my work was good enough for her to use
9 it for presentations, I don't understand how she was
10 able to say that I lacked work output. 'Cause you
11 just --

12 Q Well, she did at --

13 A -- my work to give presentations. She --

14 Q Are you saying there were never times where
15 she discussed with you the status of your projects and
16 when you were going to get them done?

17 A Yes. And I always had them done in time.
18 Sometimes she would tell me "I want something in by
19 the end of the week" and I would walk back to my
20 office, which was five paces away, and then she would
21 e-mail me saying, "Oh, I want" -- "I said to you end
22 of the week, but actually target Wednesday," which is
23 two less days -- and I still had it done by -- but
24 then she never talked to me about it.

25 Q So is it your position that she never made

1 any comments to you about errors in your work after
2 July?

3 A I will not say that I never made errors, but
4 to say that I had an inability to recognize
5 inaccuracies is false.

6 Q So she did discuss errors with you at times,
7 correct, after July?

8 A I do not recall what error if she did.
9 That's -- that's -- question.

10 Q All right. Do you recall her ever talking
11 to you about excessive socializing and looking at your
12 phone a lot after July?

13 A I do not recall, but she might've.

14 Q Okay. And you --

15 A But none of -- go ahead.

16 Q Do you recall a meeting with her on
17 September 19 or 20 where y'all were discussing
18 progress that you were making on projects?

19 A I do not recall the meeting.

20 Q Okay. Do you recall a meeting on November
21 18 to go over your Tableau stories?

22 A November 18? November 18, Katie finally
23 gave me a half-hour meeting but instructed me to use a
24 very difficult and inefficient method of solving a
25 certain problem.

1 Q So what you're --

2 A I --

3 Q You're saying at that point that you were
4 disputing what she wanted?

5 A I am disputing that when I asked her a
6 question about something that she wanted and I
7 said -- you -- "how would you do this?" And the
8 method that she told me to follow was completely
9 inefficient. I don't remember the details 'cause I
10 don't have access to my files from then.

11 But I remember wondering why she was sending
12 me on a wild goose chase as opposed to giving me a
13 more efficient way of solving a problem.

14 Q Do you recall during your November 18
15 meeting discussing that it was taking you a long time
16 to complete projects?

17 A No.

18 Q Do you recall on November 18 again her
19 making comments to you about people thought you were
20 talking on the phone or looking at your phone or being
21 engaged in non-work related tasks?

22 A No.

23 Q Would you agree that if you're not engaged
24 in work related tasks while you're at work that that
25 has an impact on your work output?

1 A I -- I don't understand what --

2 Q So would you agree that the amount of time a
3 person is working at work impacts their work output?

4 A Yes. But I was working at work.

5 Q Okay. Do you recall a meeting or talking
6 with Katie on December 6 again about the status of the
7 project -- she had assigned to you in September?

8 A On December 6, I asked --

9 Q -- that she had --

10 A I asked Katie if we could go over the work
11 from Wednesday, but she did not respond. She left the
12 office early that day without getting back to me about
13 scheduling a meeting. On Monday, December 9, I asked
14 Katie if we could go over some of the things I had
15 been working on in addition to the work that I had
16 sent her last Wednesday.

17 She told me that she was still working on
18 something else and had a conference after that so she
19 had no time for me. And as usual, she kept her door
20 closed and blocked off the calendar. On December 11,
21 I created a Tableau story with 10 interactive pages,
22 4 data sheets, 15-year view into the school's use of
23 school-based tuition. It had 15 years of student --

24 Q -- December 11?

25 A That was --

1 Q I'm sorry.

2 A -- December 11.

3 Q Okay.

4 A December 11. And I also -- after I sent it
5 to her, she told me that she had not had a chance to
6 look at it and her calendar remained blocked off and
7 her door closed. On December 12, I sent her an update
8 and asked her if there was anything else she wanted me
9 to work on. Her door continued to be closed and her
10 calendar blocked off.

11 Because she had still not -- the -- reviewed
12 the work I had sent her on Wednesday, December 4, at
13 2:00 p.m., I tried to move on and do other work. On
14 December 17 --

15 Q What are you reading? What are you reading
16 from, Ms. Khazanie?

17 A I have notes and this was in my grievance
18 form.

19 Q Okay. So are you reading from your
20 grievance -- reading -- we've asked you to produce
21 notes and I don't believe you've produced any.

22 A This is from my grievance form. This is --

23 Q So you're reading directly from the --

24 A Yes. Page --

25 Q Okay. All right. You've mentioned the

1 termination letter. I just want to, for the record,
2 get that on the record.

3 MS. JOHNSON: If you could, Court
4 Reporter, show Exhibit 12?

5 (Exhibit 12 was marked for
6 identification.)

7 THE REPORTER: Sure thing. Also, you
8 did mention Exhibit 10 earlier, but it never got
9 pulled up because I don't think questioning got
10 brought up for it. Do you want that marked on the
11 record, as well?

12 MS. JOHNSON: Oh, okay. 10 was the
13 quarterly review. Yes. If you could just -- I
14 believe she indicated she had it already. But yeah.
15 If you could just, I guess, show it to her and let me
16 ask one quick question from that.

17 (Exhibit 10 was marked for
18 identification.)

19 THE REPORTER: All right. You said 10
20 was the quarterly review?

21 MS. JOHNSON: Right.

22 THE REPORTER: All right.

23 One -- Exhibit 10 is on the screen now.

24 MS. JOHNSON: Yeah.

25 //

1 BY MS. JOHNSON:

2 Q Ms. Khazanie, that's the review you were
3 reading from earlier, correct, and I also was reading
4 from?

5 A Correct.

6 Q Okay. All right.

7 MS. JOHNSON: If you could pull up
8 Exhibit Number -- trying to move along here. If you
9 could pull up Exhibit Number 12?

10 THE REPORTER: Sure thing. One moment.

11 BY MS. JOHNSON:

12 Q Ms. Khazanie, we talked about your
13 termination letter a few minutes ago.

14 MS. JOHNSON: And if you could show the
15 second page, Court Reporter?

16 BY MS. JOHNSON:

17 Q Just for the record, is this
18 the -- Ms. Khazanie, is this -- termination letter you
19 were referring to before?

20 A That -- there was a section on it where she
21 gives the reasons -- up --

22 MS. JOHNSON: Right. Yes. That's on
23 the -- yeah. That's on the first page. Court
24 Reporter, if you could go back to the first page?

25 //

1 BY MS. JOHNSON:

2 Q In the second -- well, actually --

3 A This is not --

4 Q -- reading from the very -- yes. Reading
5 from the first paragraph, Ms. Khazanie -- you were
6 pointed to your current position as financial analyst
7 on January 14, 2019. Your continued employment is
8 contingent upon successful completion of your defined
9 probationary period; is that what it says? Correct?

10 A Correct.

11 Q And then if you go down the second
12 paragraph, I believe this is what you were referring
13 to before.

14 It says: based upon my review and
15 evaluation of your ability to meet the expectations of
16 this position, specifically your lack of competence at
17 the advanced level, inability to work independently,
18 low work output, and your inability to recognize
19 inaccuracies in your calculations and reporting, I
20 have decided to separate you from employment effective
21 January 6, 2020, correct?

22 A Correct.

23 Q That's what it says?

24 A Yes.

25 Q And that's what you were -- those were the

1 points you were referring to before, correct?

2 A Correct.

3 Q And the rest of the letter goes on to talk
4 about payout benefits and other matters about just
5 leaving the employment, correct?

6 A Correct.

7 MS. JOHNSON: If you could pull up -- I
8 want to go through a couple other --

9 BY MS. JOHNSON:

10 Q Well, going back to number 12. So the
11 reasons that were provided to you for not continuing
12 your probationary period is lack of competence at the
13 advanced level, correct?

14 A Correct.

15 Q Inability to work independently, correct?

16 A Correct.

17 Q That's what it -- low work output, correct?

18 A Correct.

19 Q And inability to recognize inaccuracies in
20 your calculations and reporting, correct?

21 A Correct.

22 Q And an inability to recognize inaccuracies
23 in your -- and reporting, one way that that's shown
24 is -- give her a model or a work product that has
25 errors in it that you didn't catch, correct -- the

1 inability to recognize your errors, correct?

2 A I guess so.

3 Q Okay. If you could -- I want to go through
4 just a couple of other documents with you.

5 MS. JOHNSON: And does anybody need to
6 take a break? Maybe we can go a little bit further
7 and then at some point take another two-minute break
8 and then I'm going to try to finish up and we'll be
9 done? But if we can just go through a couple of
10 documents, I think that will hopefully allow me to
11 just finish up quicklier afterwards. All right.

12 Does anybody need to take a two-minute
13 break now I guess is my long way of asking that.

14 MS. BATEMAN: Okay. Let's take a
15 two-minute break now.

16 MS. JOHNSON: Okay. Sounds good.

17 Court Reporter?

18 THE REPORTER: Sure thing. The time on
19 the monitor is 3:07 p.m. and we are now off the
20 record.

21 (Off the record.)

22 THE REPORTER: The time on the monitor
23 is 3:14 p.m.; we are now back on the record.

24 MS. JOHNSON: Okay. Thank you,
25 everybody.

1 BY MS. JOHNSON:

2 Q Ms. Khazanie, I want to just go through some
3 exhibits now. And I'm going to try to make this as
4 quick as possible.

5 MS. JOHNSON: If you could, Mr. Court
6 Reporter, pull up Exhibit 19?

7 (Exhibit 19 was marked for
8 identification.)

9 BY MS. JOHNSON:

10 Q So Ms. Khazanie, I'll give you a chance to
11 take a look at this and you'll need to see the bottom
12 part. And it's one of those deals where I believe the
13 e-mail chain kind of starts at the bottom and then
14 goes up.

15 A Okay.

16 Q And would you agree that that's the e-mail
17 that on June 7, 2019, where she's reminding you
18 that -- she says: your start time has been getting
19 later and later. I'd really like you to make an
20 effort to get here by 9:00 each day, correct?

21 A Yes. And then --

22 Q And then you say: yes, I realize that.
23 Definitely my fault. But then she -- on June 14,
24 compliments you for coming in, getting here by 9:00;
25 she thanks you for arriving by 9:00, correct?

1 A Correct. So I --

2 Q Right. There are times when she's, you
3 know, saying things that -- she's reviewing your work
4 behavior, correct, and whether that be acceptable or
5 unacceptable and she's telling you both ways, right?

6 A But because she said something positive in
7 June does not mean that the harassment and -- hostile
8 work environment is not true. You can -- you can
9 insult somebody and be mean to them and not answer
10 them and be hostile towards them and then say, "Oh,
11 but you" -- "but this is nice." And that doesn't
12 negate all the negative things that happened.

13 MS. JOHNSON: If you could pull
14 up -- again, I'm sorry for jumping around. But I'm
15 really just trying to speed this up and go on and go
16 through. I think the quickest way is just to go
17 through them. If you could pull up Exhibit 20, Court
18 Reporter?

19 (Exhibit 20 was marked for
20 identification.)

21 BY MS. JOHNSON:

22 Q Tell us when you're done.

23 THE REPORTER: Let me know if you need
24 me to scroll, Ms. Khazanie.

25 THE WITNESS: Okay. Okay.

1 BY MS. JOHNSON:

2 Q Do you remember the business managers in
3 March of 2019 getting upset with you for stupid
4 reasons?

5 A They were upset that they were not getting
6 the amount of funding that they -- they wanted more
7 money.

8 Q And do you recall if Katie was off that day,
9 but yet she was still communicating with you and you
10 were communicating with her? She was home with her
11 mom, who was sick; do you recall, though, that she
12 still made herself available to you via e-mail?

13 A She was at home 'cause her mom was not sick;
14 she had a knee replacement. She was not ill. And
15 I --

16 Q Well, do --

17 A I went to a meeting and I just gave her an
18 update. It's up to her whether she decided to read it
19 and respond or not.

20 Q Do you say: hope you're doing well and your
21 mom is better?

22 A Better as in her knee.

23 Q Are you trying to suggest, Ms. Khazanie,
24 that because she had a knee replacement surgery that
25 she was not in need of medical care or assistance from

1 her daughter?

2 A I am not --

3 MS. BATEMAN: Objection. Objection. I
4 mean, that's --

5 BY MS. JOHNSON:

6 Q I'm just -- let me ask you, why do you keep
7 saying that she wasn't -- I mean, she had surgery,
8 correct, to fix a --

9 A A surgery. But the way you are -- you are
10 asking me that when I communicated when her mother was
11 ill. Her mother was not ill. Ill means that somebody
12 is -- is somehow in a state that they need constant
13 care. Her mother had a knee replacement surgery and
14 was conscious and okay. And I simply sent her an
15 e-mail that said update for today. And I --

16 Q But -- go ahead.

17 A I -- as far as the business managers getting
18 upset, the business managers were there as lobbyists
19 for their department to get more money. And Katie
20 always made fun of the business managers and would
21 make comments about them like, "Oh, I'm not giving
22 them anything" or "oh, they can just wait."

23 They came to my office and I walked them
24 through it and I say in this e-mail I just smiled it
25 off. I say there that I smiled it off. Again, I gave

1 a huge smile and told her to look to the left of the
2 person, not the right, and moved on.

3 I don't see anything -- e-mail that is not
4 me just sending a status update to my boss who was out
5 of the office that day.

6 MS. JOHNSON: If you could pull up
7 Exhibit 21?

8 (Exhibit 21 was marked for
9 identification.)

10 THE WITNESS: And for -- for the
11 record, when I left UNC, Teri -- Teri from that
12 department was super supportive and asked me if I
13 needed any references in the future.

14 MS. JOHNSON: So Exhibit 21?

15 THE REPORTER: On the screen now.

16 MS. JOHNSON: All right.

17 BY MS. JOHNSON:

18 Q And if you could just review that,
19 Ms. Khazanie?

20 A Okay.

21 Q So that's an e-mail on March 14, 2019, where
22 Katie Thornsward is wanting to provide coaching to you
23 on how to deal with chairs, correct?

24 A Yes, in March.

25 Q Right. And then you said: thanks for the

1 feedback, correct?

2 A Correct. And this is not about anything
3 that happened in March; this is about after.

4 MS. JOHNSON: If you could pull up
5 Exhibit 22?

6 (Exhibit 22 was marked for
7 identification.)

8 BY MS. JOHNSON:

9 Q And we're just going to sort of take
10 Exhibit 22 -- I've grouped some e-mails together and I
11 just sort of want to take them one at a time. It
12 should be very quick. I don't have many questions
13 about any particular one.

14 I wanted to show you these in response to
15 your testimony regarding not getting information and
16 training when you first got to UNC. And you started,
17 correct, on January 14, 2019?

18 A That sounds right.

19 Q All right. And then this is the e-mail from
20 Katie to you on January 15 saying -- allocation model
21 spreadsheet, correct?

22 A Okay.

23 MS. JOHNSON: And then if you can go to
24 the second one?

25 //

1 BY MS. JOHNSON:

2 Q It's -- another e-mail from Katie on January
3 15: I just did a presentation to the chairs on the
4 state allocation model; do you recall her inviting you
5 to that so that you could see what a presentation was
6 like?

7 A That's possible.

8 Q And then she gives you her notes about the
9 allocation model, correct?

10 A Again, in January.

11 Q Right. And so you testified earlier that
12 you didn't get any training or data from UNC or Katie
13 when you first got there?

14 A This is -- this is very high level
15 information. This is not the level of training
16 that --

17 Q That a senior financial analyst needs?

18 A This is -- this is basic stuff that I could
19 learn in the first e-mail on the first day. If your
20 colleague --

21 Q Okay. And --

22 A -- training, then --

23 MS. JOHNSON: Okay. Well, could you go
24 to the next page?

25 //

1 BY MS. JOHNSON:

2 Q So you don't call this training or being
3 provided information for your job?

4 A I say -- I'm saying that this is not deep
5 training; this is very -- very high level information.

6 Q Okay. Well, you testified that you got no
7 training from UNC when you first got there unless you
8 initiated it. So I just wanted to show you a couple
9 more documents.

10 The next one is January 15. It says:
11 here's the BIOS deep dive. I'll get you access to the
12 H drive so you can see the others; do you recall that?

13 A I have not seen any of these e-mails in four
14 years -- over four years, so I do not recall.

15 Q Okay. And then on the next one, it's
16 January 17; it says: link to last EPI projection.
17 She's giving you samples of things and models and so
18 on and data, correct?

19 A Possibly, yes.

20 Q And then on January 25, e-mail from you to a
21 Rhonda Leary; do you remember who Rhonda Leary is?

22 A No.

23 Q Do you know that she was involved in
24 training at UNC?

25 A Oh. That was the one I signed up for.

1 Q All right. Well, if you look at the bottom,
2 it says: we are processing your ConnectCarolina
3 access request and our records indicate that you will
4 need to complete the following computer based
5 training.

6 So she tells you what training you need to
7 complete, correct?

8 A Correct.

9 MS. JOHNSON: All right. And if you
10 could look at the next page with full print on it --

11 THE WITNESS: I see all of this, but I
12 don't feel that January -- this stuff is -- is
13 relevant. Because what you are showing me here is all
14 things that I did independently. She would send me a
15 link and I worked on it independently. And part of
16 the thing that she fired me for was an inability to
17 work independently.

18 BY MS. JOHNSON:

19 Q Well, this is -- you -- you didn't get any
20 training when you first got there. This is training,
21 Ms. Khazanie; is it not?

22 A This is very high level training. This is
23 not specific to what we were trying to do. But --

24 Q Okay. But you needed to figure out how UNC
25 worked and review samples of prior models and so on

1 that you would be building on or working off of,
2 correct?

3 A Correct.

4 MS. JOHNSON: All right. So please go
5 to the next page; it's a January 28 -- the next page.
6 I think that's just a -- I don't know what that is.

7 Yeah, that one.

8 BY MS. JOHNSON:

9 Q And that's a January 28 e-mail that says:
10 attached is the overview from this morning. It's from
11 Katie to a bunch of people: here's a link to the fund
12 and source ranges; is that correct? And she's telling
13 you how to do various things in that e-mail?

14 A I don't remember the -- the details of this.

15 Q Okay. All right. And then on January 30 --

16 A And she might've just put me on here
17 for -- for awareness because I did not work with the
18 advancement team.

19 Q Okay. But she's inviting you in and she's
20 sharing information with you, correct?

21 A According to this e-mail, yes.

22 MS. JOHNSON: All right. And if you go
23 to the next one, January 30?

24 BY MS. JOHNSON:

25 Q Does this indicate you took FERPA training?

1 A Yes. And I registered for it -- for it on
2 my own.

3 Q Well, everybody has to register for
4 training; isn't that true?

5 A Yes. And I found the trainings, but
6 continue.

7 Q But everybody has to register for training,
8 correct?

9 A Yes. But I -- many of these I found on my
10 own. 'Cause --

11 Q So you're saying that you requested the
12 Infoporte training on your own?

13 A I did not know how to use Infoporte in the
14 university setting. So I don't remember what day I
15 registered for some of these things. But Katie -- a
16 list of -- a list of people to contact or connections
17 or anything like that. But --

18 Q You're saying she didn't?

19 A I don't remember how I go in touch with
20 Rhonda Leary.

21 Q Well, somebody would have to have told you
22 on your very first or second day because you got in
23 touch with her, correct?

24 A Yes, I did. I don't remember how I got in
25 touch with her, but I do not remember Katie connecting

1 me. But continue. I'm sorry. This is --

2 Q All right. So the next page is February 4,
3 2019. It indicates you did Infoporte training,
4 correct?

5 A Correct.

6 Q And then the next page indicates you did
7 finance reporting training, correct?

8 A These are official work, like, UNC -- wide
9 training. These are not specific -- job that I was
10 performing that I was doing at the School of Public
11 Health that --

12 Q You're saying Infoporte training wasn't --

13 A It was not a -- the -- the financial models
14 that they wanted me to create was very loosely needing
15 information from Infoporte. There were other --

16 Q Is that your --

17 A Huh?

18 Q It's your understanding that you only
19 loosely needed information from Infoporte?

20 A I did not log in -- Infoporte on a regular
21 basis. Infoporte was more for -- accounting team.

22 Q Was it something you should've been logging
23 onto more?

24 A No. Because I knew how to pull the
25 information I needed, but it was not -- it was -- it's

1 an accounting tool that I did not use very often. I
2 was doing forward looking projections and analyzing
3 different data that was not on Infoporte. But
4 continue.

5 MS. JOHNSON: If you can go to the next
6 page, February 12?

7 BY MS. JOHNSON:

8 Q It's Katie asking you: do you have enough
9 to do. She's saying that she -- given you some
10 Tableau mockups, correct? And you tell her you do
11 have enough stuff to do.

12 A She says: I want to start building
13 department dashboards in Tableau. I have a lot of raw
14 data you can start working with. Just need to collect
15 it all and put it one place for you.

16 Q So you say -- if you look at the bottom
17 where she starts, she says: until I am back in
18 tomorrow. Is your Infoporte set up correctly now?
19 And then she says: let me know if you don't have
20 enough and I'll scrounge up some more learning
21 exercises for you today, correct? At the very bottom.

22 A I don't see that.

23 Q You don't see it at the very bottom?

24 A I see --

25 MS. JOHNSON: Court Reporter, if you

1 could scroll down?

2 BY MS. JOHNSON:

3 Q "Until I'm back." You don't see that?

4 A Yes. And I did have enough to do.

5 Q Right. And then you say --

6 A Again, this --

7 Q -- the next one, you --

8 A -- February.

9 Q Yeah. But we're talking -- you denied that
10 you got training when you go there. You denied that
11 people provided you sufficient information to do your
12 job. Ms. Khazanie, the middle e-mail when you respond
13 to her when she asks you about Infoporte, you say:
14 thanks again for the tickets this weekend.

15 She gave you tickets to a game, correct?

16 A Correct.

17 Q And then you say: my Infoporte is correct
18 now and I'm able to back into all your numbers except
19 for NCIPH was a bit off, but the rest were fine. And
20 I've held off calculating the SBT since you said I
21 need to learn the neg carryback / proper method for
22 that. I went to training yesterday all afternoon and
23 was able to practice some there, too.

24 I've got stuff to do and I think I can stare
25 at that allocation model and department budgets 'til

1 the end of time. If you want me to do something else,
2 let me know.

3 And then that's when she says: you're
4 welcome. Sounds like you can stay busy today,
5 correct?

6 A Correct.

7 MS. JOHNSON: All right. And if you
8 can move down to the next e-mail, Court Reporter? The
9 next page that has writing on it. I think there's,
10 again, a page that's just an address.

11 THE WITNESS: Okay.

12 BY MS. JOHNSON:

13 Q And then on February 15, she sends you EPID
14 data for Tableau, right?

15 A That's not for Tableau. That is --

16 Q What is it?

17 A That is an Excel --xlsx means that it is an
18 Excel file.

19 MS. JOHNSON: All right. So if you
20 look at the next page?

21 BY MS. JOHNSON:

22 Q The subject is EPID three-year projection
23 review. And she says: I'm booking for an hour and a
24 half, but we may not need that much time. Supriya
25 will join us so she can hear the discussion as she

1 continues to learn how the financials work here,
2 correct?

3 A Correct.

4 Q All right. And then the next one is
5 February 18 -- oh, she moves a meeting. She changes
6 the meeting to a certain date, correct?

7 A Correct.

8 Q And then you write her an e-mail on April 8
9 saying: I'm very confused as to how we would give 4k
10 to some of these. And then she responds to you that
11 you have the raw data; it's all stuff you filtered out
12 on the non-compensation tabs. She's giving you
13 guidance in these e-mails.

14 Why don't you extract that raw data and then
15 do S-U-M-I-F-S's.

16 A Sumifs.

17 Q Sumifs. Right? She's giving you guidance,
18 right?

19 A In April.

20 Q And then on -- do you remember having a
21 retreat February 14, like a team retreat?

22 A Yes.

23 MS. JOHNSON: All right. And if you go
24 to the next one?

25 //

1 BY MS. JOHNSON:

2 Q It's April 30; reports inventory. She sent
3 you an attachment. Was that an attachment of -- what
4 do you recall about reports inventory? Does that --

5 A I don't recall anything.

6 Q Okay. And then on May 6 --

7 MS. JOHNSON: If you can go to the next
8 e-mail?

9 BY MS. JOHNSON:

10 Q And again, I'm just showing you some
11 documentation given your testimony about receiving no
12 feedback and guidance from her. Does this one -- it's
13 a May 6 e-mail stating: we need to start building out
14 the next iteration of the allocation model. An she
15 says: give me a call once you're settled in this
16 morning so we can discuss.

17 A Correct.

18 Q Is that correct? And she gives you a data
19 file, correct?

20 A Correct.

21 Q And then the next e-mail -- and again, these
22 are just examples -- it's a July 10, 2019, e-mail
23 where write her and you say: these are the things I'm
24 missing, correct?

25 A Correct.

1 Q And then she responds back to you and
2 answers them in red, correct?

3 A People to go talk to for the --

4 Q Yeah. Well, what were you -- isn't that
5 what you needed, information --

6 A Yes --

7 Q -- about how to get the answers --

8 A -- this is all -- this is all to do with the
9 period between January and July/August where I said
10 things were fine.

11 Q All right. Also --

12 A We -- nothing that we've gone over yet has
13 been outside of that timeframe.

14 MS. JOHNSON: If you could look at the
15 next one?

16 BY MS. JOHNSON:

17 Q July 12, 2019, is an e-mail from -- saying
18 the Core/FLO stuff is what we reviewed together
19 yesterday, correct?

20 A Correct. Again, July.

21 MS. JOHNSON: All right. Next one?

22 BY MS. JOHNSON:

23 Q E-mail from Katie to you dated September 9,
24 2019, saying she mocked up ideas for Tableau
25 workbooks. Play with these ideas and see what you

1 come up with, right?

2 A Yes. And I --

3 Q But she's giving you something --

4 A And I created those Tableau workbooks and
5 had them available. And as she says, I view these as
6 phase one, and I made those phase one documents.

7 Q And I believe you testified earlier that she
8 didn't really give you any projects much after August
9 or July.

10 MS. JOHNSON: You can look at the
11 next --

12 THE WITNESS: Yeah. A mockup is not a
13 project.

14 MS. JOHNSON: Can you look at the next
15 page, please, Court Reporter?

16 BY MS. JOHNSON:

17 Q This is an e-mail October 28, 2019, and she
18 says: there are a number of things I'd like you to
19 complete this week. Finish your F&A analysis, create
20 a SB story in Tableau --

21 A Which I did.

22 Q -- finish the -- 19 sources uses analysis.
23 Please review my school financial summary; do you see
24 that?

25 A Yes. And I did all of these things.

1 Q Well, this was after you asked her for more
2 guidance on projects to do, correct?

3 A And I responded to this -- this and I did
4 all of it.

5 Q Okay. But I'm just saying she's giving you
6 projects, correct?

7 A None of these projects are -- are, like,
8 what I don't understand is that these are very simple
9 projects that I made -- I did extensively. I made a
10 detail -- where she says: detail drilldown for
11 Tableau; I did that. I created the SBT story. I
12 didn't just do one story; I did a ten-page story.

13 Finish the sources and uses analysis. I did
14 that and I did it extensively and I -- for a VLOOKUP
15 and I gave her a mapping table and I gave her things
16 that other people could use in the future. So each of
17 these things I did and then some.

18 And she is saying that I had a low work
19 output and lack of competence and unable to work
20 independently. This is completely contradictory to
21 that. These are --

22 Q So if you -- let me go back to Infoporte.
23 If you didn't pull information from Infoporte, where
24 did you pull it from?

25 A I said I didn't pull information from

1 Infoporte on a daily basis. Once I pulled it once, it
2 was good. It was historical data and I -- I often
3 just got things from share drives that somebody had
4 already pulled data from. But I -- Infoporte was not
5 some -- I didn't have to log in and make adjusting
6 entries in an accounting system or anything like that.

7 Q And my question to you isn't whether you did
8 all these projects; my question to you is on this
9 October 28 e-mail, she's assigning you three projects,
10 correct?

11 A Yes. In October -- and I had
12 those -- I -- those things done.

13 Q Okay. That's not my question, though,
14 Ms. Khazanie. My question just is, did she assign you
15 projects on October 28? And she said she wanted
16 you -- them this week, correct?

17 A Yes. Katie e-mailed me a list of --

18 Q And that was --

19 A -- and I did so. And then on October --

20 Q And then --

21 A -- I gave her an update of what I'm working
22 on.

23 Q Right. So on October 28, that was after
24 your October 4 e-mail, correct, where you asked for
25 more guidance and projects from her?

1 A Yes. And the period between October 4 and
2 October 28 is a little while.

3 Q Well, because you were on vacation for two
4 weeks of that time period, correct?

5 A Yes. But there's still many days that I was
6 there and she was there.

7 Q And she was on vacation -- one week,
8 correct?

9 A Yes. But I sent that e-mail on October 4
10 and I was on vacation starting October 10.

11 Q And y'all met before you left for vacation
12 after your October 4 e-mail?

13 A I don't remember the exact date, but
14 possibly.

15 MS. JOHNSON: Okay. Can you look at
16 the next e-mail?

17 BY MS. JOHNSON:

18 Q October 31 you wrote -- excuse me. October
19 30, again going from the bottom up. You said you
20 wanted to give her an update, correct?

21 A Correct.

22 Q And you state at the end: I've been working
23 on this nonstop, but I'm not sure I'll be able to
24 finish everything perfectly by Friday. I might need
25 some more time if that's okay.

1 And she responded to you the next day and
2 answered some things in red and she says: I want you
3 to do your best and we will see where things stand
4 when we meet on Monday, correct?

5 A I don't remember this e-mail, but yes. From
6 what you're showing here.

7 Q You said you were having trouble finishing
8 the projects by the time she wanted them done, right?

9 A I said I'm not sure I'll be able to finish
10 everything perfectly. Perfectly -- that it is a
11 final, finished project with no errors.

12 Q Is it too much for her to expect a final
13 project in a deadline that she gives to you?

14 A When she assigned it to me on October 28 and
15 this e-mail was written on October 30 to turn around
16 three projects in two days, yes. That's --

17 Q So you think that was too much for you?

18 A Three projects in two days?

19 Q And then can you look at the second -- well,
20 actually, it was by Monday. It was a week. She gave
21 you a week, correct?

22 A And thus I gave her a status update on
23 Wednesday --

24 Q And she says see what you can get --

25 A -- less --

1 Q -- says --

2 A -- if you want to see the timestamp --

3 Q -- you were telling her --

4 A If you want to see the timestamp from
5 October 28 assignment, there is at most 48 hours
6 between these two periods.

7 Q Well, you say I'm not going to -- you wrote
8 her back on Wednesday and you said: I'm not going to
9 be able to finish things up by Friday -- she had asked
10 you to finish them up that week. So on Wednesday, you
11 were asking for more time, correct?

12 A I might need some more time.

13 MS. JOHNSON: Okay. And then if you
14 look on the next page, if you go down to the bottom?
15 BY MS. JOHNSON:

16 Q She had asked you to write down the purposes
17 as you look things up because I will want to drill
18 deeper and I don't want you to have to look everything
19 up a second time. She's asking you to do a deeper
20 analysis and so that -- she wants to see what your
21 purposes are and she's going to -- she's reviewing
22 you, correct?

23 A Yes. And then if you see her response, "No,
24 you didn't drop the ball." Look -- scroll up --

25 Q Right. But she's saying to you she -- but

1 she's giving you review -- and this is October 28:
2 the Infoporte descriptions don't have enough data,
3 which is why you are having to pull up the actual
4 journal entries and capture information about the
5 purpose.

6 And there again, Infoporte -- you have been
7 getting more for from Infoporte?

8 A You're asking details that I do not recall
9 and I don't want to put -- I mean, these -- this is
10 getting so deep in the weeds and none of this actually
11 has to do with any of the things that she sent. But
12 continue.

13 MS. JOHNSON: And then if you look at
14 October 28 -- if you look on the next page?

15 BY MS. JOHNSON:

16 Q You start giving her the purposes, correct?
17 Is that your writing in green?

18 A Yes. Correct. But if any of this was an
19 issue beyond just normal work -- why wasn't there a
20 conversation where she sat down with me and said,
21 "Supriya, these are the issues I'm having. I need you
22 to do this"? As opposed to just back and forth
23 e-mails where we talk about something, she could have
24 told me, "These are the things I need you to work on."

25 Q She's telling you in e-mail -- you would

1 agree that that's how a lot of people communicate in
2 the workforce these days, correct?

3 A That -- people communicate via e-mail, but I
4 would say that if this was any more than normal work
5 back and forth, there would've been a review
6 where -- as -- as I had it after my first quarter.
7 'Cause you've been going -- for the last hour-plus
8 you've been going through line by line by e-mails.

9 What I was told and what I signed in
10 my -- in my first quarter probationary review was that
11 I was going to have quarterly check-ins and if there
12 was an issue I would initial it --

13 Q Well, Ms. Khazanie, you had a lot of
14 check-ins with her, correct? Via e-mail, via
15 meetings. I mean, these e-mails are her reviewing
16 your work and giving you feedback on your work,
17 correct?

18 A This is very -- very -- just back and forth
19 banter about work and I would say that this is
20 completely contradictory to her saying that I have a
21 low work output.

22 Q Okay. So on November -- the next one on
23 November -- excuse me. Yeah. November 8. And again,
24 you say: the walkthrough on Monday was so helpful to
25 me. I think a lot of things clicked for me. Moving

1 on to Tableau now.

2 So on November 8 y'all met, correct? You
3 had a walkthrough?

4 A Possibly. I don't have access to my
5 calendar to --

6 Q All right. Then on November 8, do you
7 recall where you sent the next one, the next pages?

8 A Can you show me?

9 Q Yeah. I'm sorry.

10 MS. JOHNSON: The next page, Court
11 Reporter.

12 BY MS. JOHNSON:

13 Q If you start at the bottom, you tell her you
14 finished the Q1 sources and uses. If you have some
15 time to go over it with me, I'd appreciate it. I
16 think if I got this one right, moving forward should
17 be a lot smoother. I felt much more confident this
18 time.

19 And then she says: let's review Monday,
20 correct?

21 A I -- can you scroll --

22 Q Please work on -- yeah. Sorry. It's
23 remote; not perfect. Yeah. And she said: let's meet
24 Monday. And then she tells you specifically start
25 working on the next one because that's what you asked

1 her for was more guidance, right, and projects?

2 A Okay.

3 MS. JOHNSON: And then the -- page,
4 Court Reporter?

5 BY MS. JOHNSON:

6 Q Do you see where she -- giving you on
7 November 19 data questions on SBT revenue?

8 A Okay. You see that I asked for 2009 data
9 and we're currently in 2019. This is 2009 data; it is
10 ten-year-old data. FY2009.

11 Q Do you know if you asked her for that data?

12 A I don't remember, but I do think the
13 ten-year-old data is kind of useless. I put it --

14 Q Well, is that --

15 A I put it into the model to show a deeper
16 look, but ten-year-old financial data is not going to
17 move the needle for what they are looking for. And I
18 think that is something I really wanted to kind of
19 push. Like, you can give me 2009 data, but that's not
20 what we're doing in 2019; that's not the outputs I
21 need to create in 2019.

22 A lot of this stuff is -- is outdated. I
23 needed --

24 MS. JOHNSON: Okay. If you can go the
25 very last page of this exhibit?

1 BY MS. JOHNSON:

2 Q You say: Katie -- missing chunks of data
3 for a deep dive of sources and uses. I have found
4 several old files, but can't pull old data in
5 Infoporte to check if it's right or the numbers are in
6 the right ballpark.

7 A Yes. Because the -- the university -- the
8 university migrated to Infoporte later. And the
9 information that she wanted -- the older years, 2008
10 through 2015 -- '14, which would give me -- look into
11 the data -- should have existed in these -- this H
12 drive where they kept legacy documents. And those
13 legacy documents did not exist and I didn't have the
14 old data.

15 So when I was trying to create a 15-year
16 view of how school-based tuition and sources and uses
17 and things were used in the university, I needed clean
18 data that we could use that would show the change over
19 time.

20 Now, if I have 2008 but I'm missing
21 2010 -- or missing 2009 but then it jumps to 2010,
22 that's not a clean data source. And info --

23 Q Well, you're the one who just said why is
24 2009 data relevant, so is it now relevant?

25 A I'm telling you that 2009 through -- 2008

1 through 2014 data, this is a wild goose chase that she
2 was sending me on And this was not pertinent and not
3 important and I was doing this because she told me to.

4 Q Did you tell her you thought it was a wild
5 goose chase and that it wasn't worth your time?

6 A I would never talk that way to my boss. I
7 tried to be respectful with her.

8 MS. JOHNSON: Okay. All right. So
9 Court Reporter, if you can turn to Exhibit 23?

10 (Exhibit 23 was marked for
11 identification.)

12 BY MS. JOHNSON:

13 Q And I'm just going to represent to you,
14 Ms. Khazanie, that they're some more e-mails
15 documenting meetings.

16 A Okay.

17 Q All right. So the first one is a
18 meeting -- document that you had a meeting with Katie
19 on April 5 -- allocation model review; is that
20 correct?

21 A Possibly.

22 Q Okay. And the second one -- I'm trying to
23 go through these fast -- eating up the afternoon here.

24 A Yeah. I --

25 Q April 16, 2019, that was the date of your

1 workplan/performance evaluation?

2 A Which day? Can you scroll?

3 MS. JOHNSON: That second e-mail.
4 Second page.

5 THE WITNESS: Okay.

6 MS. JOHNSON: And the next page?

7 BY MS. JOHNSON:

8 Q The meeting on April 24 for brainstorm
9 dashboard environment, correct?

10 A Again, that period in -- while Todd Nicolet
11 was still at the school.

12 Q The next one, review Tableau work on May 28,
13 2019; is that a meeting you recall?

14 A That is not.

15 Q Okay. You don't recall or are you disputing
16 that it occurred?

17 A Yeah. I -- Tuesday -- I -- I don't recall
18 this.

19 Q Any reason why you wouldn't be at work on a
20 Tuesday?

21 A 'Cause that was right around Memorial Day.

22 Q So did you take time off in addition to your
23 two-week vacation during that one year?

24 A I'm looking.

25 No. I was at work that day, so I don't

1 remember.

2 Q Okay. Well, did you -- if she asked you for
3 meetings, did you refuse to go to them?

4 A I never refused a meeting with her.

5 Q Okay. All right. And then on June 3, 2019,
6 do you recall a meeting on that day to go over
7 allocation model?

8 A I -- I do not have access to my old
9 calendar. I do not know if there are meetings here.
10 I'm -- it, like, I'm sorry, Kari, but it is 4 o'clock
11 and I took the morning off. And if the meeting is
12 there and I accepted it as the subject says, then I
13 attended it.

14 Q Okay. All right. Well, then, let me skip,
15 then, to just a couple of them, then, because, you
16 know, we've got a meeting on June 17, June 25. We've
17 got a meeting where y'all agreed to talk on July 26.
18 We've got a meeting on August 8 called brainstorming
19 and review.

20 A Yeah. And -- and --

21 Q Got a meeting on August --

22 A -- for the first half of the year, if we had
23 a meeting her door was open and I would go to it. It
24 was the second half of the year if I -- she sent -- if
25 one of us sent a meeting invite and oftentimes she

1 would close her door and not have the meeting.

2 Q Do you recall --

3 A Now, which ones of these meetings that
4 happened for and which dates and which time, I have
5 not seen my calendar since I was terminated in
6 June -- January of 2020. So I cannot tell you exactly
7 which ones. I'm sorry.

8 Q Okay. All right. So just again, I'm going
9 to try to speed up here. We've got a meeting on
10 August 13, review allocation model. I have a meeting
11 on August 14, Tableau planning session. Meeting on
12 August 13 -- I think we already went over these.

13 A Okay.

14 Q Meeting on September 17 -- well, that one
15 might -- oh, yeah --

16 A That one might what?

17 Q Meeting on September 17 that was accepted,
18 it was called catch up on projects; do you remember
19 that meeting?

20 A I do not -- I -- I do not remember these
21 specific meeting invites. I've never actually seen
22 this formatting of -- of appointments being e-mailed
23 to an address like this. This is new.

24 Q Oh. You don't have where people do invites
25 for meetings or block off their calendars?

1 A Yeah. But I don't get an e-mail like this,
2 so I don't know how the -- I never got these --

3 MS. JOHNSON: Court Reporter, could you
4 go down to the one that starts at the page September
5 20?

6 THE REPORTER: What page is that?

7 MS. JOHNSON: They're not numbered. I
8 apologize. But the very top of the page it says
9 there's an e-mail. It's several pages down. It's
10 religious holidays and events -- and the day is
11 September 20, 2019.

12 THE REPORTER: Found it.

13 MS. JOHNSON: Okay.

14 BY MS. JOHNSON:

15 Q So if you go at the bottom, it's an e-mail
16 from Katie that says: just wanted to reinforce -- we
17 discussed this morning. And it's an e-mail dated
18 September 19, correct?

19 A Mm-hmm.

20 Q So that means a meeting did happen at that
21 time, correct? And then she also says: I'm fully
22 supportive of the need to take time for religious
23 holidays and events. Please just make sure you put
24 them on the schedule, correct?

25 A Yes. That's -- that's --

1 Q And then --

2 A -- she says it here and then when I actually
3 take time to do something religious, it was not just
4 putting them on the -- on the schedule so we can plan
5 around them; it was singling me out and telling
6 everyone about it and making it a very public display.

7 It was not a fully supportive -- me to take
8 time and make sure you put them on the schedule. It
9 was on the schedule. It was also on blast to
10 everybody.

11 Q Well, do you know whether or not for
12 purposes of morale she wanted to explain why the
13 highest paid person is coming in later than everybody
14 or not coming in?

15 A I never --

16 Q Do you know if that's --

17 A I never did not -- come in. I don't think
18 30 minutes of coming in late and then staying later in
19 the evening, of shifting the schedule just a little
20 bit -- it wasn't shifting it by hours; it was shifting
21 it by a half hour. That is not -- that is not
22 something that would interrupt or disturb anyone's
23 morale on a team.

24 MS. JOHNSON: Court Reporter, could you
25 go to the next page?

1 BY MS. JOHNSON:

2 Q So Ms. Khazanie, in your charge and
3 your -- the EEOC charge, as well as the UNC SHRA
4 grievance, you make a very big deal out of your e-mail
5 on October 4 and you indicate she never followed up
6 with you. Do you recall that October 4 was a Friday?

7 A I do not. I don't have a calendar --

8 Q Well, if I told you it was a Friday, would
9 you accept that at least for now?

10 A For now.

11 Q All right. For now. That's fair. All
12 right. And she responds to you on October 4 and asks
13 to have -- it says she'll have a meeting with you on
14 October 7, the very next business day, correct?

15 A Okay.

16 MS. JOHNSON: And then, Court Reporter,
17 if you could go a couple of -- two pages?

18 THE WITNESS: You see that it says
19 start time/end time 8:00 p.m.?

20 MS. JOHNSON: Could you just keep on
21 going?

22 THE WITNESS: No, no, no. Right here
23 it says star time and end time of this check-in is
24 8:00 p.m.

25 MS. JOHNSON: Well, keep on going.

1 BY MS. JOHNSON:

2 Q Do you see the next page?

3 A Yes, where it says 8:00 p.m.

4 MS. JOHNSON: Keep on going. These are
5 just all the different invites and times of
6 scheduling. Keep on going.

7 Okay. Stay there.

8 BY MS. JOHNSON:

9 Q What do you -- you respond to --

10 MS. JOHNSON: Wait, wait. That one.
11 Court Reporter, go down. Sorry.

12 BY MS. JOHNSON:

13 Q What do you -- her when she -- well, is that
14 your response to her on October 4?

15 A I respond, "Thank you," despite the fact
16 that it's at 8:00 p.m.

17 Q But look at the bottom. It says: when,
18 Monday, October 7, 4:30 p.m.

19 A Go up.

20 Q On the same -- thank you e-mail. Do you see
21 that?

22 A Yeah. And we saw several things just now
23 that said 8:00 p.m.

24 Q Right. Are you disputing that she asked to
25 meet with you on that Monday and you said "thank you"?

1 A I do not remember this exactly, but I
2 do -- I -- I don't remember this exchange at all.

3 Q All right. And so if this documentation is
4 correct, she responded to your October 4 e-mail on
5 that day and asked you about setting up a meeting on
6 the very next business day, correct?

7 A If this -- if this is correct. I don't
8 recall this at all.

9 Q So are you disputing that you wrote her back
10 and said "thank you"?

11 A Yeah. I have not seen my e-mails in, four
12 years, Kari.

13 Q Well, so let me ask you this, why didn't you
14 mention that she responded and set up a meeting the
15 very next business day in either your EEOC charge or
16 your SHRA grievance form or your complaint?

17 A Because she responded does not mean we
18 actually met. And I think that's something
19 that -- not taking -- just because there is a -- there
20 is a meeting here does not mean her door was open or
21 she was in the office or she actually met with me. A
22 meeting invite can be sent to anybody.

23 Q So you're disputing that you met?

24 A I do not remember the days I met to this
25 extent -- to this extent that I would have the

1 confirmation e-mail that was sent to my e-mail. I
2 don't have that level of access to my calendar or my
3 notebooks where I kept everything written with dates
4 or my -- my e-mail. Like, it's just -- there's a lot
5 that I don't have -- that you do.

6 Q Okay. It says you accepted it. It says you
7 accepted it.

8 A I don't know that I accepted it. I'm
9 doubting whether or not she actually met with me. But
10 it is 4:09 on a Friday and I would like to move this
11 along. If this is -- if we're just going to be going
12 through calendar invites.

13 Q Well, Ms. Khazanie, this is my chance to ask
14 you questions and I get to decide what the questions
15 are. And we're allowed a certain amount of time to
16 take a deposition and I'm within that time, but I am
17 trying to move it along for everyone's benefit, I
18 promise you.

19 Do you know what the university hours were,
20 official hours?

21 A I don't know that there are official hours.
22 I would say most places are 9:00 to 5:00.

23 Q All right. Well, so could it be 8:30 to
24 5:00 or 8:30 to 4:30?

25 A I -- I am not sure if they have that, but I

1 would say 9:00 to 5:00 is customary.

2 Q Okay. And part of your job was to be
3 available to chairs and department heads, right, when
4 they were onsite?

5 A Correct.

6 MS. JOHNSON: Okay. And just finishing
7 up with this exhibit, Court Reporter, if you could go
8 to the second to the last page?

9 BY MS. JOHNSON:

10 Q It's a November -- meeting that you had to
11 go over a SBT story. And then the last page are
12 e-mail exchanges where she talks to you about let's
13 meet tomorrow. And it's an e-mail dated
14 December -- is that not right?

15 A Yeah.

16 MS. JOHNSON: All right. If you could
17 pull up Exhibit 24, Court Reporter?

18 (Exhibit 24 was marked for
19 identification.)

20 THE REPORTER: Sure thing. One moment.

21 THE WITNESS: And here I say that it's
22 a lot of information and she says that there is a lot
23 of information that you've provided.

24 BY MS. JOHNSON:

25 Q All right. So Ms. Khazanie, I'm --

1 MS. JOHNSON: If you could just show
2 her, Court Reporter --

3 BY MS. JOHNSON:

4 Q -- this first page talks about your EI
5 training; do you see where you registered in this
6 first one and it says the location and time is
7 4/23/2019 from 11:00 a.m. to 12:00 p.m., correct?

8 A Correct.

9 Q And that's the one you went to and thought
10 was a waste of time?

11 A I thought it was not pertinent at all to
12 what they were saying.

13 Q Okay. Even though it was recommended by
14 your supervisor?

15 A My supervisor who had never -- who got it
16 from Steve Ragan and Steve Ragan had never actually
17 sent anybody to it and did not know what it was about.

18 Q Okay. And you said there was only one
19 session.

20 MS. JOHNSON: Court Reporter, if you
21 could turn to page 3?

22 BY MS. JOHNSON:

23 Q Do you see where it says: this message
24 confirms your registration for the following training
25 program, emotional intelligence. And it says May 9,

1 2019, from 1:00 to 2:00 p.m.?

2 A And do you see that it says it's online web?

3 Q Yeah. And you -- do it; did you? That --

4 A I don't remember if I did, but it --

5 Q Well, if you didn't do it -- you registered
6 for it; do you recall doing the second day?

7 A I do not remember.

8 Q Well, if they expected you to do it and you
9 didn't, do you have a reason for that?

10 A I probably -- when they asked me what it was
11 about and I told them that it was about having the
12 ability to speak to people and not being shy that
13 Katie even said to me, "Well, that's the opposite of
14 what I said."

15 Q Do you know -- did you ever tell them you
16 didn't do part two of the training even though you --

17 A I do not remember.

18 Q Okay. Well, you know they can tell if you
19 did it or not?

20 A Well, then they -- said something to me if
21 they did 'cause I do not recall this at all.

22 MS. JOHNSON: Okay. All right.

23 Exhibit Number 25.

24 (Exhibit 25 was marked for
25 identification.)

1 THE REPORTER: One moment.

2 THE WITNESS: Okay.

3 BY MS. JOHNSON:

4 Q So you had testified before that Katie never
5 encouraged diversity training; do you recall receiving
6 this e-mail on February 15 where she's encouraging
7 people to go to "understanding unconscious bias"?

8 A Okay.

9 MS. JOHNSON: All right. And then if
10 you could turn to the --

11 THE WITNESS: It's one thing for her to
12 tell us to take it, but then not accommodating
13 people's schedules to actually do it is different.

14 BY MS. JOHNSON:

15 Q All right. All right. So do you recall
16 her --

17 MS. JOHNSON: If you could turn to the
18 last page, Court Reporter?

19 BY MS. JOHNSON:

20 Q Did you attend that diversity training do
21 you know?

22 A I don't remember.

23 Q Okay.

24 A Everyone went to Thinkposium.

25 That's -- that's where -- when we were in a group

1 during Thinkposium -- when I -- when we were in a
2 group at Thinkposium and everyone was talking about
3 their -- about their experiences about what it was
4 like -- about, you know, what are different things
5 you've went through.

6 And I explained the hair comment -- somebody
7 during Thinkposium and they said, "Oh, my God. I
8 would quit that job in a heartbeat. You should sign
9 up. You should go to HR." And everyone at my
10 Thinkposium group -- because it is at the Friday
11 Center -- when we were supposed to share things that
12 happened and I shared the hair comment in my safe
13 group during Thinkposium, everyone told me to go to HR
14 and leave the School of Public Health.

15 Q So --

16 A So yes, I attended Thinkposium, as did the
17 entire School of Public Health.

18 Q Right. And so --

19 A And I don't think Katie was there.

20 Q And you testified that she didn't encourage
21 people to go. She starts this e-mail where: I've
22 discussed that I want everybody participating in
23 diversity and inclusion activities, correct? And
24 everybody on the team did go to Thinkposium, correct?

25 A Everyone in the school went to Thinkposium;

1 that was not a specialized training. That is
2 a -- half of the university is there; it is at the
3 Friday --

4 Q You just said everybody went, so now
5 you're -- I'm confused. Did everybody on your team
6 go?

7 A Everyone on my team went and a lot of people
8 from the school went.

9 MS. JOHNSON: Okay. All right. If you
10 could pull up Exhibit 28?

11 (Exhibit 28 was marked for
12 identification.)

13 THE REPORTER: One moment.

14 BY MS. JOHNSON:

15 Q So Ms. Khazanie, you had testified before
16 that you were upset -- and I believe you put in your
17 charges that you were upset and felt singled out when
18 Katie sent an e-mail out to everybody about you taking
19 the two-week yoga course. And I believe I asked you
20 did she ask your permission first and you testified
21 "no."

22 If you could take a look at these e-mails?
23 And if you start --

24 A I do not recall this e-mail.

25 Q Well, okay. So she sends you an e-mail at

1 4:39 on August 1 and says: I'm also going to send an
2 e-mail to everyone about special requests like this so
3 everyone knows how I view these types of requests and
4 what my parameters are when I approve them. I'm not
5 singling you out, but I do need everyone to understand
6 you're not getting special treatment.

7 And then you write her back later that night
8 and you say: absolutely feel free to use my case as
9 an example. I don't feel singled out at all. And
10 then you go on to talk about the yoga program,
11 correct?

12 A Yeah. And I -- I don't recall this, but I
13 do feel that -- if I replied at 9 o'clock -- if I
14 replied at 9 o'clock, which it shows that I did, I
15 probably was mulling over this all day and was feeling
16 very pressured from her and felt that I had to say
17 this.

18 Q Well, you say: absolutely feel free to use
19 my case --

20 A Yes, because I felt --

21 Q -- example. I don't feel singled out at
22 all.

23 A Yeah. And I sent it at 9 o'clock at night,
24 which means that I probably was just feeling so
25 pressured that I sat on it all day and then finally

1 was -- said, "okay. Fine." But I --

2 Q But this is what went to Katie, though,
3 right?

4 A What?

5 Q That's what went to Katie?

6 A Yes. And it went to Katie at 9 o'clock at
7 night after me feeling -- like she straight up says:
8 I don't want -- I'm not singling you out, but she was.
9 How was I --

10 Q But she asked you --

11 A -- how --

12 Q She asked you first, correct?

13 A Yeah. But -- but was I supposed to respond
14 to her, "Absolutely not, don't do that. I," like,
15 she -- I already felt that she was a bully, so I kind
16 of did as she said and tried to be perky and happy
17 about things.

18 It was hard for me -- was really hard for me
19 'cause, like, when somebody puts you on the spot like
20 this -- it's really hard when your boss puts you on
21 the spot and you just -- trying to keep a smiling face
22 and keep going, which is what I did.

23 MS. JOHNSON: All right. And if you
24 could pull up Exhibit 26?

25 //

1 (Exhibit 26 was marked for
2 identification.)

3 THE REPORTER: One moment.

4 MS. JOHNSON: Thank you.

5 BY MS. JOHNSON:

6 Q Ms. Khazanie, just wanted to go over a
7 couple e-mails; again, more reviews from Katie and
8 comments from Katie. Here's a comment -- do you
9 recall this July 26 e-mail where there was a concern
10 about the revenue in one of the models keeps growing?

11 And then you write her back and say: I'll
12 look at it right now -- if I can make sense of it.
13 I'm not quite sure what is causing it to move that
14 way.

15 A Okay.

16 Q And then do you see on July 28 where --

17 MS. JOHNSON: The next page, Court
18 Reporter.

19 BY MS. JOHNSON:

20 Q -- where it says: the declining revenue
21 continued to bother me. It just didn't make sense to
22 me even after we talked on Friday, so I looked at it a
23 little deeper yesterday. You had some errors in your
24 revenue calculations? Do you see where she's pointing
25 out errors to you?

1 A One error. It's not --

2 MS. JOHNSON: Go to the next page.

3 BY MS. JOHNSON:

4 Q November 5. Do you see where you say: this
5 math doesn't pan out; we end up with a total of
6 105 percent? And you're not supposed to have
7 105 percent, correct?

8 A Yes. And then I say: if you have a second,
9 I can explain what I mean. I'm going to try and fix
10 it and wait for your approval.

11 MS. JOHNSON: Okay. All right. Can
12 you go to the next one?

13 BY MS. JOHNSON:

14 Q On November 12, the bottom one, e-mail from
15 you to Katie: here is a corrected version without the
16 hard code error in the enrollment section. And she
17 writes you back: thank you. It's not good that this
18 was wrong in the version you gave me and I sent to
19 chairs, correct? Is that what she says?

20 A Yes.

21 MS. JOHNSON: And then if you could
22 turn to the next page?

23 BY MS. JOHNSON:

24 Q This is a document that's attached to your
25 grievance dated December 12.

1 A Okay.

2 Q -- thought I'd give you an update on some
3 things I'm working on. And then you state on that
4 first one: I'll have one dashboard on budget cuts,
5 one on perm budget, and will keep going with
6 comparisons to HC and other factors. And you
7 indicate: I definitely need to think into this one
8 more since the source of state isn't all from the
9 students like school based tuition?

10 A Okay.

11 Q And then do you see for the F&A story -- do
12 you recall when she assigned the F&A story to you?

13 A I do not.

14 Q Do you recall in that October 28 e-mail she
15 wanted you to finish the F&A project this week?

16 A The project is different from the Tableau
17 book, but okay.

18 Q All right. And then you say: I've only
19 uploaded the F&A data as a table so far. When I
20 finish the descriptions, I'll go deeper. And then you
21 say -- for the sources and uses story, you say: this
22 one's still in the early stages?

23 A Yes. These are -- you are taking projects
24 and Tableau stories; they are two different projects.
25 It is a phase one and a phase two --

1 Q Okay. That's fine. And then on the very
2 last paragraph on the next page, you're talking about,
3 I guess, a Tableau -- and you say: I've struggled to
4 make it work for a while now, correct?

5 A Yes. Because the playable version -- a
6 playable version means that somebody else can log into
7 it and manipulate the data and it plays like a video
8 game. I could make it so that other people could use
9 it and that's what I had done so that I could present
10 it and other people could have it.

11 But a playable -- do I -- if you read the
12 e-mail, it says: I talked -- Nick and I -- Nick was
13 on the data team -- talked through the pros and cons
14 of putting a playable version in Tableau where
15 leadership could enter headcounts and FTE.

16 That means that the data source is no longer
17 locked; the data source is now something that they can
18 mess with -- "they" meaning department chairs
19 and -- and allowing your data to no longer be locked
20 means that -- you have to put in securities all the
21 way down to make sure that nothing is being -- is
22 changed correctly and that is a very time consuming
23 thing to put into Tableau.

24 And it's -- that's why I said it almost
25 seems counterproductive to spend that much time on

1 setting it up when it's a quick and easy job in Excel.

2 'Cause in Excel you can just lock the page that has
3 the data and allow others to log into it and it's the
4 same thing as Tableau; it just doesn't have the name.

5 'Cause Tableau is --

6 Q But she wanted you to do it in Tableau,
7 though, right?

8 A And why I was explaining to her that -- that
9 the time was not -- was not worth putting it in
10 Tableau. It was not worth the -- of buying licenses
11 for everybody at the school so that they could see the
12 exact same thing that's in Excel just in a expensive
13 software version.

14 Q All right. And then just quickly looking at
15 the last page, it's an e-mail from Katie to you on
16 Friday, January 3. The very last sentence says: have
17 you completed the state funds piece for FY2016 to 2019
18 (part of the Tableau assignment I gave in September)?
19 Do you see where she states that?

20 A Mm-hmm.

21 Q And does that indicate to you that she'd
22 been waiting for that since September?

23 A And I had given it to her several times and
24 tried to talk to her --

25 Q But --

1 A -- several times. And if you see all the
2 other e-mails, I'm -- anyway.

3 MS. JOHNSON: If you could pull
4 up -- I'm trying to move fast. If you could pull up
5 Exhibit 27?

6 (Exhibit 27 was marked for
7 identification.)

8 BY MS. JOHNSON:

9 Q One of your -- and while he's pulling that
10 up, one of your claims in this case is you felt too
11 self-conscious to eat outside of your office?

12 A Mm-hmm.

13 Q Do you see this first page? I'm just going
14 to send you a couple of documents about lunches.

15 Do you see this first one where you and Teri
16 are thinking about eating lunch?

17 A Okay.

18 Q -- March?

19 A Okay.

20 Q So you weren't self-conscious about --

21 A I wasn't going to stop eating. I'm a human
22 being.

23 Q But that's what you say in your charges,
24 that you were too self-conscious to eat in front of
25 people afterwards. So that's why I'm just asking you.

1 A Yeah. And I -- I -- being self-conscious
2 doesn't mean I can go without food.

3 Q Do you tell Teri: I'm hungry always?

4 A 'Cause that was the joke that Katie always
5 made about me.

6 Q Okay. And then the next page is a team
7 lunch that you organized, inviting Katie -- May 21; do
8 you remember organizing a team lunch on May 21?

9 A That sounds very much like me, that I try to
10 keep up comradery.

11 Q Do you recall -- okay. Do you recall --

12 MS. JOHNSON: Next page.

13 BY MS. JOHNSON:

14 Q Do you recall organizing or asking -- team
15 lunch on June 5 because you and Katie had -- you were
16 the winning Jeopardy team and won a \$25.00 gift card?

17 A Kate and I were the winning Jeopardy team;
18 not Katie --

19 Q Kate. Sorry. Kate. Yes. But do you
20 recall -- and then Katie agrees to pay the difference?

21 A Yeah. That was me trying to be a good
22 colleague.

23 Q All right. And then the next page, August
24 16, do you recall asking where people wanted to go for
25 the next team lunch?

1 A Again, these are -- these are me just trying
2 to be a good colleague and -- and foster some
3 comradery.

4 Q And then the last page, December 10, you
5 said: I wanted to have a team lunch since we haven't
6 done anything in a few months?

7 A Again, trying to foster -- comradery.

8 Q All right. So we've gone over your
9 termination letter. And the reasons that were
10 provided in there were inability to meet expectations,
11 inability to work independently, inability to
12 recognize inaccuracies in calculations, and I think
13 we've discussed all those.

14 Regarding the low work output, I just wanted
15 to ask you a couple more questions about the low work
16 output. Again, we already talked about that Katie had
17 received complaints that you were spending time
18 talking with others and distracting them from working;
19 do you recall us talking about that?

20 A Yes.

21 Q Do you also recall us talking about
22 excessive shopping online?

23 A I recall.

24 Q And you denied that you did any excessive
25 shopping on your work computer during work time?

1 A Excessive.

2 Q All right. Ms. Khazanie, you understand
3 that people can pull up browser history?

4 A Okay.

5 Q And I haven't had a chance to go through all
6 of that, but let me just -- I can pull so many
7 different pages. Do you recall on December 9 reading
8 up on Ellen DeGeneres, George Bush, and the Death of
9 Uncritical Niceness?

10 A No. I don't recall --

11 Q So would that have --

12 A -- browser history from 2019.

13 Q Okay. Well, I'm just asking you. Do you
14 recall reading how bad are K-cups for the environment?

15 A That sounds --

16 Q -- and December 9 --

17 A -- article.

18 Q All right. Do you recall shopping at
19 Athleta on December 9 for women's yoga clothing?

20 A Possibly.

21 Q Okay. Do you recall looking up nail
22 polish -- this is on December 6 during work time.
23 Zoya nail lacquer?

24 A Possibly.

25 Q -- fall collections watches and reviews?

1 A I -- I don't -- any of this is, like, I
2 didn't --

3 Q You agree that low work output is related to
4 how much time at work you're spending at work,
5 correct, on work?

6 A Correct.

7 Q Okay. Do you recall on December 6
8 researching or looking up love letters to boyfriend, a
9 Google search?

10 A I don't remember this.

11 Q Do you remember December 6 looking
12 up -- pedal pushers? And I'm just going to flip
13 through a bunch of different pages because I don't
14 want you to think I'm just picking on one day.

15 THE WITNESS: You're -- you're -- go
16 ahead, Valerie.

17 Valerie, you're muted.

18 MS. JOHNSON: You're muted.

19 MS. BATEMAN: Are you going to produce
20 this list of documents you're asking her about?

21 MS. JOHNSON: Yes. It's been asked
22 for. We will -- I have to produce it as a link
23 because it's so big, Valerie. I can't produce it
24 as -- document, but yeah --

25 MS. BATEMAN: Okay. Yeah. So --

1 MS. JOHNSON: -- I believe
2 it's -- we'll produce it. It's been asked in
3 discovery.

4 MS. BATEMAN: Okay.

5 MS. JOHNSON: Because I'm -- I'd like
6 to further ask questions about --

7 MS. BATEMAN: Okay. Well, I'm just
8 saying we'll have to supplement that by request for
9 other people's browser's history during the same time.

10 MS. JOHNSON: Okay. Well, we'll object
11 to that. But okay. All right. Moving on.

12 BY MS. JOHNSON:

13 Q December 5, you recall looking up women's
14 jewelry?

15 A I --

16 MS. BATEMAN: I think she's already
17 said she doesn't recall her browser history from 2019.
18 So it --

19 BY MS. JOHNSON:

20 Q All right. Just tell me if you don't
21 recall --

22 A I don't recall.

23 Q -- looking up J.Crew drapery mock neck top
24 in Dutch floral?

25 MS. BATEMAN: I think she's already

1 said she doesn't recall her browser history from all
2 of 2019. So you can assume that the answer to every
3 question you're going to ask her from that inch and a
4 half stack of paper is going to be she doesn't recall.

5 MS. JOHNSON: No. It's more
6 than -- stack. We're talking --

7 MS. BATEMAN: Okay. Well, I'm not
8 there. I can't tell how big it is. So --

9 BY MS. JOHNSON:

10 Q All right. Well, let me just ask you a
11 couple more. Let me ask you a couple more because I
12 don't want you to think I'm just picking --

13 MS. BATEMAN: I mean, objection; asked
14 and answered.

15 MS. JOHNSON: Okay. Well, I haven't
16 asked the same question --

17 MS. BATEMAN: Yeah. You asked
18 her -- they're all from 2019 and she's already said
19 she doesn't recall. You're going to make it an
20 exhibit? The exhibit will speak for itself. There's
21 no reason for you to continue to ask her questions
22 that she's already said she doesn't recall. Let the
23 exhibit speak for itself.

24 MS. JOHNSON: I'm going to ask a few
25 more questions, Valerie.

1 MS. BATEMAN: She doesn't recall, Kari.

2 MS. JOHNSON: All right. You can

3 object --

4 MS. BATEMAN: She -- I'm objecting.

5 I'm saying this is asked and answered. You've
6 got -- how big is the stack of paper you have there?

7 MS. JOHNSON: A lot. It's huge.

8 MS. BATEMAN: Yeah, it's huge.

9 BY MS. JOHNSON:

10 Q Do you remember on --

11 MS. BATEMAN: And so this is just
12 harassing my client. She's already said --

13 MS. JOHNSON: No, it's not.

14 MS. BATEMAN: -- she doesn't recall.
15 She doesn't recall her browser history from 2019.

16 MS. JOHNSON: I don't think asking her
17 questions about how she spent her workday is
18 harassment, Valerie. I --

19 MS. BATEMAN: You can ask her how she
20 spent her workday. That's not asking her how she
21 spent her workday. You're not asking her --

22 MS. JOHNSON: Okay.

23 MS. BATEMAN: -- how much time did you
24 spend looking up these websites --

25 MS. JOHNSON: Valerie, I'm going to ask

1 more --

2 MS. BATEMAN: Nothing --

3 MS. JOHNSON: I'm going to ask more
4 questions about this. If you want --

5 MS. BATEMAN: Well, I'm going to --

6 MS. JOHNSON: -- to object --

7 MS. BATEMAN: If you want to ask her
8 how she spent her workday, I don't have a problem with
9 that. But you're making the transcript unnecessarily
10 long and expensive.

11 MS. JOHNSON: -- and I'm going to
12 object --

13 MS. BATEMAN: She doesn't recall --

14 MS. JOHNSON: -- to the speaking --

15 MS. BATEMAN: -- any of the browsing
16 history --

17 MS. JOHNSON: But she might
18 recall -- you haven't let me ask her, Valerie. There
19 might be a topic that jogs her memory. There might
20 be --

21 MS. BATEMAN: Okay. Have at it. Have
22 at it, Kari. Have at it.

23 MS. JOHNSON: Thank you. Thank you.

24 BY MS. JOHNSON:

25 Q Do you recall looking for slim stretch

1 perfect shirts and black watch tartan on December 2?

2 A I do not recall.

3 Q Do you recall Clark's Arlo boots on November
4 27? And again, I'm being just very -- picking --

5 A Yeah. And -- and, Kari, I think what you're
6 missing is that I had three screens in my -- in my
7 computer. And if something was up on one screen, it
8 would show -- even if I was doing work somewhere else,
9 it would show there for days or it would show there.

10 I don't know why if I did something at -- if
11 I looked up something at lunch time or during a break
12 that you would go through each of my browser history.
13 I do not remember everything I went through in 2019.

14 Q Okay. You're aware that browser history
15 tells the times of the day? Is there any reason why
16 you would be shopping and checking out at 10 o'clock
17 on a workday -- work related. Is there any work
18 related reason why you would be shopping for women's
19 clothes at 10 o'clock or 2:00 p.m. on a workday?

20 A I do not recall what -- the circumstances.

21 Q And you know that it also tells you when you
22 click on things if it changes? Do you recall Black
23 Friday customer breakfast November 22; do you recall
24 that?

25 A I do not recall.

1 Q Do you recall looking at a Connie jersey top
2 on November 21?

3 A I do not recall.

4 Q Do you recall purchasing items from Bowden
5 US on November 21?

6 A I do not recall.

7 Q So do you recall looking up Thrillist Best
8 and Rest podcast on November 21?

9 A I do not recall.

10 Q Do you recall looking at J.Crew Sophie
11 sweater blazer outfit on November 20? And I'll start
12 going faster.

13 A I do not recall.

14 Q Would it surprise you, Ms. "Khazanie" --

15 MS. BATEMAN: Khazanie. Khazanie. Why
16 don't you just call her Supriya? Call her Supriya if
17 that'll be easier.

18 MS. JOHNSON: Okay. I'm going to go
19 with Ms. Khazanie. And I apologize. As I think
20 you've been able to tell, I do struggle with words
21 sometimes.

22 BY MS. JOHNSON:

23 Q Do you recall looking up Sarah Feinberg on
24 Washington Post on November 18?

25 A No.

1 Q Is that the name --

2 A I don't recall.

3 Q Is that your supervisor at Washington Post?

4 A It might've been her name.

5 Q Do you recall researching gyms near downtown
6 Raleigh on November 18?

7 A I do not recall.

8 Q Do you recall UGGs women's gray boots on
9 November 18?

10 A I do not recall. Kari, I do not recall my
11 2019 browser history.

12 Q Okay. All right. Okay. All right. So
13 finishing up just a couple of questions and I think
14 I'm really getting to the end here.

15 So you indicated that you talked to Janet
16 Scarce and you talked to her one time after
17 Thinkposium, correct?

18 A I think that was the timeline.

19 Q And did you make an appointment to talk to
20 her?

21 A I don't remember. I -- I think I might've
22 just stopped in her office.

23 Q Okay. And did you -- but you didn't request
24 that she file a formal complaint or anything?

25 A Because I was afraid I would be retaliated

1 against if I did.

2 Q Okay. And you also talked to Charletta; is
3 that correct?

4 A I talked to Charletta, yes.

5 Q And you say in one of your documents that
6 you scheduled an appointment for her for December 21;
7 that was a Saturday, correct?

8 A Yes.

9 Q And so why would you schedule an appointment
10 with her at her house on a Saturday --

11 A I scheduled an appointment with her. My
12 boyfriend at the time had gotten a new car and her son
13 really wanted to -- really liked cars and wanted to
14 see one in-person.

15 Q So when you say you scheduled an
16 appointment, it wasn't like an official appointment
17 during her work hours; was it?

18 A No. She -- her son really wanted to see the
19 new car and had never seen one. And I -- she
20 said -- asked if he could see it and I said, "Sure."
21 And the only time that my boyfriend and I were both
22 free was a Saturday. And the -- didn't ask --

23 Q Did you know before you were terminated
24 that -- did you know in December that Katie was
25 considering terminating you?

1 A I did not, but I did -- I wish she had let
2 me know. It would've been fantastic for to have had a
3 mature adult conversation and just said to me, "You
4 know what? This is not working out." And I would
5 have gladly, gladly left. Gladly.

6 And I would've -- I wanted to move -- I
7 was -- she knew I was moving to downtown Raleigh. I
8 would have transferred to a different school with a
9 different boss where somebody cared about me,
10 appreciated me, and -- and we got along better.

11 She did not get along with me, she did not
12 like me, and she treated me badly and she harassed me.
13 And when -- if she had just told me, "You know what?
14 This isn't working out," I would've been perfectly
15 happy -- perfectly happy to move on with my life as
16 opposed to -- did, which is just out of the blue
17 firing me a week before -- no warning.

18 Q Are you aware that UNC has a policy where
19 they don't terminate people in December because of the
20 holidays and people being absent from a lot of that
21 time?

22 A I am not aware of that, but if that's the
23 truth then she should've had a conversation with me
24 and just told me.

25 Q Okay. So you indicate that you've talked

1 with Steve Ragan and you said -- early November.
2 Isn't it true, Ms. Khazanie, that the reason you
3 talked with him was because of the sexual harassment
4 complaint involving a coworker; it wasn't because of
5 Katie?

6 A He came to me -- Katie -- somebody came
7 to -- to -- I -- I think it was on Charletta's
8 colleagues or somebody went to Steve Ragan to tell him
9 about the colleague. Steve Ragan came to me and said,
10 "Do you want to press charges or say something about
11 what he said to you?" And I said, "I really don't
12 want to pursue that."

13 I thought it was a stupid thing he said to
14 me, but the person -- he does not make me feel
15 uncomfortable at work. The person that really -- feel
16 uncomfortable at work is Katie.

17 Q So do you recall in your exit
18 interview -- Steve Ragan was there, correct?

19 A Correct.

20 Q And was Abby McLennan there, as well?

21 A Yes.

22 Q And do you recall when Steve Ragan asked
23 you, "Why didn't you bring these up to me" and that
24 you indicated in front of both of them, "Because I was
25 afraid because you and Katie are so close"? Don't you

1 recall saying that in your exit interview?

2 A I said that to him the day he came to me
3 about the colleague. I said, "Katie makes me more
4 uncomfortable." And he said, "Just have a
5 conversation with her." And I did have a conversation
6 with her and we've gone over the e-mail where I had
7 the conversation with her. And then I was retaliated
8 against.

9 Q So if Abby McLennan wrote up notes --

10 A But yes, I did -- I did feel that Katie and
11 Steve were so close that Steve might not protect me.
12 And Steve didn't protect me when I went to him.

13 Q But why would the third person in the room
14 with you and Steve during your exit interview write up
15 notes saying that he specifically asked you, "Why
16 didn't you bring up any of this to me before" and that
17 you --

18 A But I did bring it up with him before.

19 Q But that's not what you said then. You
20 said, "Because I was afraid you two were so close."
21 So why did they hear that; what made two people hear
22 that?

23 A I don't know what they wrote up. I told
24 Steve and I told Janet and I told Charletta that Katie
25 was bullying me. In -- exit interview as I was being

1 walked out when -- if Steve says that he had no idea
2 that this was happening, that is -- that's not the
3 truth. Because I did come to him and I did go to
4 Janet and I did go to Charletta.

5 Q Did you ever go to Kauline Cipriani; did you
6 ever talk to her before you were terminated?

7 A No.

8 Q Okay. Did you talk to anyone else besides
9 Janet and Steve?

10 A Yes. I think it was a known fact that Katie
11 was -- was bullying me. I --

12 Q Well, so now --

13 A -- everyone --

14 Q -- who else? Who else?

15 A I think everyone up and down that hall knew
16 that I was uncomfortable and everyone up and down that
17 hall knew that it just was not going well. And
18 I -- I --

19 Q Okay. So it wasn't --

20 A -- my hope -- my hope by talking to
21 Charletta was out of desperation -- out of just
22 absolute desperation that maybe after I am
23 a -- after -- my plan was that on January 14, the day
24 I became a full employee, I was going to work up the
25 courage to tell Katie that I want to go somewhere

1 else.

2 Q Okay. So your plan was only to work with
3 Katie for another week or so?

4 A Well, she was harassing me.

5 Q But I'm just saying was that your plan? I'm
6 just asking you what --

7 A My hope was that I -- she would -- she would
8 stop harassing me and I wanted to go somewhere where
9 she was not harassing me. And I would have gladly
10 taken a transfer somewhere else. I would've applied
11 to another job in state government.

12 I lived in downtown Raleigh; there were
13 ample opportunities somewhere else for me to go
14 somewhere else where my boss was not bullying me.

15 Q Well, then, how come it took you -- per your
16 discovery responses -- a year to find another job?

17 A Because when you apply for state jobs, the
18 first thing that they take are SHRA employees that
19 want to transfer within the system; that's the
20 first -- they -- there are many jobs that you can't
21 even apply for unless you are a transfer employee.
22 That was the first thing. The second thing was it was
23 a pandemic.

24 Q Well, but your plan -- you left in January
25 and you were saying your plan was to start looking for

1 another job in January and that it would've been easy
2 for you to get one. But then at --

3 A If I had been an SHRA employee, which I was
4 not. I -- I was -- one week shy of getting
5 that -- getting that status and that protection.

6 Q Let me try to just finish up with a couple
7 of quick questions. And then I want to take a very
8 short break to just glance through -- because I really
9 am trying to finish.

10 Did you ever talk with anybody I the
11 "omsbud" department at UNC?

12 A I was told to talk to somebody from
13 "omsbud," but I didn't know who to reach out to.

14 Q Okay. So I want to go over your damages.
15 And let me just ask you this -- we talked about how
16 long you were out of employment -- how long did you
17 get unemployment after you left UNC?

18 A I -- whatever the North Carolina employment
19 period is. And then --

20 Q Did you get any other --

21 A -- there was -- there was some
22 COVID -- COVID things, but that's it.

23 Q Right. Okay. What other forms of income
24 did you have?

25 A Nothing.

1 Q Okay. Were you living with your
2 fiancée/boyfriend at that time? I think you were.

3 A Yes. Just --

4 Q Okay --

5 A -- to be okay.

6 Q So you've indicated in your answers to
7 interrogatories that you were diagnosed with anxiety,
8 but then in supplemental responses you indicate that
9 you did not seek any treatment after your termination;
10 which one is it? And you produced no medical records.

11 A And I will not produce medical records to
12 you. I --

13 Q So -- this, were you diagnosed -- did you go
14 seek any type of medical treatment after you were
15 terminated because of your termination?

16 A I was very depressed, I was crying all the
17 time, and I talked to my primary care physician about
18 it.

19 Q And did he diagnose you with a condition?

20 A I was not -- he said I had situational
21 depression from being fired.

22 Q Okay. So you have talked to a doctor about
23 it and have received a diagnosis?

24 A He said it was situational depression from
25 having stressful time at work and being fired. And he

1 said, "Once you find the right job, everything will
2 fall into place and you'll be okay." But I think --

3 Q And you're --

4 A -- abuse -- the abuse was what was causing
5 me to be anxious.

6 Q So you're refusing to produce medical
7 records?

8 MS. BATEMAN: You know what? If you
9 want a statement from her doctor -- I don't even know
10 if he put it in her medical records --

11 MS. JOHNSON: Valerie, we're going to
12 file a motion to compel for the records and hold this
13 deposition open because you haven't produced them.
14 You said she didn't seek treatment after saying she
15 did and --

16 MS. BATEMAN: Well, I --

17 MS. JOHNSON: -- and now she's
18 saying -- you said because she didn't have insurance
19 and now she's saying she did. So we'll handle that in
20 a motion to compel, but she's indicated --

21 MS. BATEMAN: You can do that, but I
22 think you're misstating our discovery responses.

23 MS. JOHNSON: No, actually -- okay.

24 If you can pull up, Court Reporter --

25 THE WITNESS: I -- I cannot be forced

1 to provide you with medical information without my
2 release. I do not want my medical records to be
3 available to you or anybody. It is a
4 conversation -- me and my physician.

5 BY MS. JOHNSON:

6 Q Then are you or are you not claiming
7 emotional distress in this case?

8 MS. BATEMAN: No. She's claiming back
9 pay. That's exactly what we said in our discovery
10 responses. She's claiming back pay --

11 MS. JOHNSON: Valerie, it's not -- you
12 state that she's claiming emotional distress and in --

13 MS. BATEMAN: She said she was not
14 formally treated for her emotional distress; she saw
15 her GP.

16 MS. JOHNSON: Okay. I'm going to -- if
17 you can pull up Exhibit 3, Court Reporter?

18 Okay. If you could pull up
19 number -- go to page 17. All right. And then so
20 my -- if you can actually go to the prior page? No.
21 I -- no. Page 17.

22 BY MS. JOHNSON:

23 Q I'm asking you to describe the emotional
24 distress and your response is: as a result of my
25 being bullied and my wrongful termination, I suffered

1 loss of self-esteem and was diagnosed with situational
2 depression. I was prescribed antidepressants and
3 antianxiety medication.

4 Did you recall saying that, Ms. Khazanie?

5 A I -- my physician said, "If you want to take
6 medicine for this, I can prescribe it to you." And I
7 did not take the prescription. I did not do any more
8 with it and I sought assistance from other places by
9 talking to my yoga instructor and talking to religious
10 leaders and trying to deal with it holistically.

11 MS. JOHNSON: Court Reporter, can you
12 pull up Exhibit Number 11?

13 (Exhibit 11 was marked for
14 identification.)

15 BY MS. JOHNSON:

16 Q I'm going to ask you this again while he's
17 pulling that up. Are you claiming emotional distress
18 or not in this case as a damage?

19 A Valerie has all of the --

20 MS. BATEMAN: Kari, we've answered the
21 interrogatories the way we've answered them. I think
22 my client's responses speak for themselves. You
23 asked --

24 MS. JOHNSON: Okay. Well, actually --

25 MS. BATEMAN: You asked if she was

1 claiming emotional distress damages; she said she
2 suffered emotional distress. You said, "We want to
3 see the treatment records for it." She said, "There
4 are no treatment records for it because I handled it
5 holistically."

6 I think this is a weight of the
7 evidence, not an exclusionary issue. But if you --

8 MS. JOHNSON: -- said --

9 MS. BATEMAN: -- if you want to --

10 MS. JOHNSON: Valerie --

11 MS. BATEMAN: If you -- I'm not
12 finished talking. If you want to do a motion to
13 compel, then go right ahead and we'll deal with that
14 on its merits. But she can have emotional distress
15 without having sought treatment for it.

16 MS. JOHNSON: You know, Valerie, I
17 agree. But she says she sought treatment. She said
18 she got diagnosed and sought treatment. So we're
19 entitled to those records. Also then he pulled up
20 Exhibit Number 11, which are -- supplemental
21 responses.

22 If you can turn to page 7 where I ask?
23 Because I said in the deficiency we're entitled to the
24 medical information. She says --

25 MS. BATEMAN: That's page 11. That's

1 page 11.

2 MS. JOHNSON: No, page 7. Sorry.

3 Page 7.

4 MS. BATEMAN: Yeah. You asked about
5 all health problems or conditions for the past 12
6 years; that's overbroad --

7 MS. JOHNSON: Valerie, can -- yes.

8 BY MS. JOHNSON:

9 Q And then in your supplemental responses or
10 in response to our deficiency notice, Ms. Khazanie,
11 it's a -- additions noted in the response to
12 interrogatory number 19, plaintiff did not seek
13 treatment for emotional distress resulting from her
14 termination date due to a lack of health insurance.

15 So we have one response where you're saying
16 you were diagnosed. You've just testified you
17 discussed it with your primary physician. And then we
18 have a response saying that you didn't seek treatment
19 because you didn't have insurance. So which is it?

20 MS. BATEMAN: If she didn't have health
21 insurance that covered, like, a therapist or something
22 like that, then she didn't have health insurance to
23 cover that and she didn't seek the treatment. She
24 already told you that her --

25 MS. JOHNSON: She testified she saw a

1 primary.

2 BY MS. JOHNSON:

3 Q Did you not -- Ms. Khazanie, we've got what
4 you testified to under oath --

5 A I -- I saw -- you are allowed -- I -- I paid
6 for the limited, like, Obamacare package that allowed
7 me to see my primary care physician once. It did not
8 cover me to go to a psychiatrist or a psychologist or
9 a therapist that would pay for regular treatments. I
10 did not want to take --

11 Q But you brought it up with your primary
12 physician, correct?

13 A I did.

14 Q Okay. All right. And he diagnosed you with
15 situational depression, correct?

16 A He said this -- situational depression. I
17 do not know what he wrote in my medical records. But
18 as -- he told me -- you get to a place where you are
19 not abused and you have a fulfilling job, you will be
20 okay. And I --

21 Q And has that happened --

22 A -- to that --

23 Q -- now that you have a fulfilling job?

24 A I do.

25 Q Okay. So your situational depression has

1 ended?

2 A Correct. 'Cause the situation --

3 Q Ms. Khazanie, has --

4 A -- the situation was the abusive boss and
5 the unemployment.

6 Q And you've had other abusive bosses before,
7 correct?

8 A I have.

9 Q And you've been the victim of sexual
10 harassment at Credit Suisse, correct?

11 A Correct.

12 Q And have you ever been treated for
13 depression before?

14 A No.

15 Q Who is your primary physician?

16 A I don't have to answer this.

17 MS. BATEMAN: Yeah, I mean --

18 MS. JOHNSON: Okay. Are you
19 saying -- Valerie, are you instructing her not to
20 answer?

21 MS. BATEMAN: I'm just saying she said
22 she had a conversation. I'm happy to get a copy of
23 her medical records and see if he actually wrote
24 anything down, but she's already testified that it was
25 just a conversation with him.

1 MS. JOHNSON: Well, I've asked for
2 that. I asked for that in --

3 MS. BATEMAN: I --

4 MS. JOHNSON: You --

5 MS. BATEMAN: -- you asked -- let's go
6 up and look at the interrogatories. You asked for all
7 health problems or conditions for the past 12 years.
8 That was your interrogatory request.

9 MS. JOHNSON: I asked -- yes. There's
10 two --

11 MS. BATEMAN: All health conditions --

12 MS. JOHNSON: -- requests and one --

13 MS. BATEMAN: -- or problems for the
14 past 12 years. That's not even remotely relevant to
15 her damages in this case.

16 MS. JOHNSON: Valerie, we'll just look
17 at the responses and look at your answers. But I want
18 to move this along.

19 BY MS. JOHNSON:

20 Q Ms. Khazanie, we -- and again, I'm trying to
21 move this along. So you've indicated that you were
22 out of work for, I guess, a year. You have a higher
23 paying job after -- year and during that time you
24 received unemployment and I guess some sort of COVID
25 benefits. And then you say you're looking for

1 attorney fees; do you have a number for your attorney
2 fees yet?

3 MS. BATEMAN: No, she doesn't. And
4 that's attorney-client anyway.

5 MS. JOHNSON: Okay. That -- I'm just
6 asking. I'm just asking, Valerie.

7 BY MS. JOHNSON:

8 Q After you filed your SHRA grievance with
9 UNC, you had a mediation and we've explored this in
10 detail in discovery.

11 But you indicate that it was your
12 understanding that the mediation agreement that you
13 signed didn't cover the claims in this lawsuit because
14 you -- after you conferred with an attorney and it was
15 your understanding that you could proceed with these
16 claims, correct?

17 A Correct.

18 Q Who was that attorney?

19 A Valerie.

20 Q Okay.

21 MS. JOHNSON: Valerie, if you don't
22 mind, I really am trying to speed this up. I'm going
23 to check my notes real fast. I think I'm at the end,
24 but I just need to check my notes for like -- if you
25 can give me five minutes?

1 MS. BATEMAN: Yeah, that's fine. Let's
2 go off the record.

3 MS. JOHNSON: All right. Thank you.

4 THE REPORTER: The time on the monitor
5 is 5:03 p.m.; we are now off the record.

6 (Off the record.)

7 THE REPORTER: The time on the monitor
8 is 5:09 p.m.; we are now back on the record.

9 BY MS. JOHNSON:

10 Q Ms. Khazanie, just one kind of topic I
11 wanted to just ask you about is when was the last time
12 you talked with anybody at UNC?

13 A I do not remember. I had a -- a -- Melvin
14 reached out to me on -- on some form of communication.
15 Either --

16 Q Social media?

17 A -- my phone. Melvin and Joseph just both
18 asked to see how I was doing.

19 Q And when was that?

20 A I don't remember. I don't recall.

21 Q And I'm not trying to pin you down to a
22 specific time, but was it -- do you know, was it like
23 in the -- has it been in the last couple of months?

24 A I don't think -- it's -- it -- they said --

25 Q Was it --

1 A -- congratulations on getting married, so it
2 must've been in the last two years.

3 Q Okay. Okay. That's right. All right. And
4 so how about Charletta; when was the last time you
5 talked with Charletta?

6 A Charletta called me in June of 2020.

7 Q Mm-hmm.

8 A Because she called to see how I was doing
9 because I lived downtown and there were -- that was
10 during BLM protests.

11 Q Oh. And did y'all talk about your
12 employment or anything during those communications?

13 A She said, "Why don't you" -- "have you found
14 anything yet?" And I said, "No." And she said, "Why
15 don't you just find a job remote?" And that's all I
16 remember.

17 Q Okay. And prior to June of 2020, had you
18 talked -- did you talk with her any other time?

19 A She called me -- she called me the day I was
20 fired. And told --

21 Q Okay. And what'd y'all talk about --

22 A -- not -- she said she can't take -- she had
23 promised that on the 14th of January she would go with
24 me to Kauline Cipriani, the dean of diversity and -- I
25 don't remember her exact title -- and that she would

1 help me -- just tell her about my situation and help
2 me is what she told me.

3 Q And did you ever after your termination talk
4 with Kauline Cipriani?

5 A No.

6 Q Okay. And so besides Charletta and Melvin
7 and Joseph Love, have you talked with anybody at UNC
8 since you were terminated? Or texted. I should ask
9 that more broadly. Have you communicated?

10 A I do not recall who I talked to immediately
11 after being let go or fired, but I have not kept in
12 touch with anyone from the school.

13 Q Do you recall sending e-mails out to some of
14 the chairs or business managers?

15 A Yes. After I left, I did.

16 Q Okay. All right. And do you recall calling
17 Katie an emotional predator in those e-mails?

18 A I'm sure I -- because she is -- to me she
19 was.

20 Q Do you recall referencing Trump in those
21 e-mails?

22 A I do not recall referencing Trump, but I do
23 recall saying that Katie was -- Katie was a bully.
24 And I -- I have no -- the hardest part about this
25 entire case is that I came forward about a bully and

1 you are pulling in every other thing and not going to
2 the source of what I had said and what I came forward
3 about.

4 And I don't think anyone should feel
5 protected by the State Human Rights Act and feel
6 protected by HR because what you have done is -- is
7 confirmed that speaking truth to power is a bad thing.

8 Q When you just brought up working remotely,
9 that reminded me of one other thing I think you said
10 in your charge. Katie let you work remotely a decent
11 amount, correct?

12 A A handful of days.

13 Q Are you aware that she let you work more
14 remotely than anybody else in the department in her
15 finance team at the time?

16 A I think everyone would have loved to have
17 done it, they were just too afraid of her. I had --

18 Q But you weren't; you asked --

19 A Huh?

20 Q You weren't afraid to ask to work remotely;
21 were you?

22 A I had come from investment banking and
23 consulting where people work from anywhere; from
24 a -- from a back of a taxi to -- hotel room -- and
25 I -- especially in 2023.

1 This sounds kind of crazy, but asking to
2 work remotely for a day -- it was not for a extended
3 period of time; it was often because I went on a trip
4 over the weekend and it was cheaper to fly back on
5 Monday night rather than Sunday night, which is --

6 Q But that was in -- but we're talking about
7 2019 before COVID, correct? And people at state
8 government didn't really work remotely, correct?

9 A Correct. And I asked -- it was when I went
10 out of town to visit my family in New Jersey or in
11 Denver or something of that nature -- I told her that
12 the flights are cheaper if I fly out on a Monday night
13 rather than flying out on a Sunday night; is it okay
14 if I work remotely on Monday.

15 Q And so --

16 A She was very hesitant about it. She did not
17 let me -- and the whole time I was remotely working,
18 she harassed me with phone calls and texts and
19 messages and e-mails and my whole family watched this
20 and they all said, "My gosh, she bullies you."

21 Q Well, you were working, though, right? You
22 considered it a workday?

23 A It was a workday, but she was particularly
24 harassing me more because I was remote. All of --

25 Q And --

1 A -- she was --

2 Q -- tell me --

3 A -- she was checking on me and she would
4 message. And when I was in Denver, Colorado, she told
5 me that she would not be able to log into a meet and I
6 would have to conduct it. A meeting I had never
7 conducted before, but she also knew that the time
8 difference was two hours. So I woke up at 6:00 in the
9 morning and I conducted -- meeting.

10 Q Well, but you were at work. You could've
11 taken it as a vacation day if you had had the time,
12 right?

13 A I wanted to save up my time so that I could
14 take a substantial vacation to Europe and not use it
15 up for a day here and a day there.

16 Q But it's not -- like a supervisor has a
17 right for you to -- on a day that you're saying you're
18 working to attend a meeting, correct?

19 A It is. But a supervisor, knowing that you
20 are two time zones away -- probably if they were kind
21 not ask you to work at 6:00 a.m.

22 Q Okay. And then just according to my
23 records -- tell me if this meets with your
24 recollections -- that you worked remotely
25 approximately three times in March, two times in

1 April, two times in May, one time in June, four times
2 in July, and one time in November; does that sort of
3 match up?

4 A That does not match up.

5 Q Okay. So if we have documentation that
6 shows that those were remote days for you --

7 A Four times in March?

8 Q Three times in March. And I think I have
9 four times in -- yeah. I have July 5, July 8, July
10 26, July 29, November 27, March either 4 or 5, March
11 either 15 or 16, and March -- it was either 29 or
12 March 3.

13 A I -- this -- this is far more detail than I
14 have recollection of.

15 Q Okay. But are you surprised to hear that
16 you were allowed to work remotely more than any other
17 person on the finance team?

18 A I -- I had a laptop and other people wanted
19 to work remotely.

20 Q But you got to, right?

21 A I don't understand why this is considered --

22 Q Well, you've mentioned that; it's in your
23 claim about not being able to work remotely. That's
24 why I'm bringing it up.

25 A Yeah. And -- and a couple days here and

1 there during the course of the year is not a huge
2 privilege in my opinion.

3 MS. JOHNSON: Okay. I don't think I
4 have any further questions, believe it or not.

5 MS. BATEMAN: Well, I just have one. I
6 have one.

7 EXAMINATION

8 BY MS. BATEMAN:

9 Q Ms. Khazanie, there have been a lot of
10 questions today about the rights of a supervisor to do
11 certain things like control your work, you know,
12 decide whether you can be on leave; just a variety of
13 things. What was your understanding or did you have
14 an understanding that supervisors also had
15 obligations, as well as rights?

16 MS. JOHNSON: Object --

17 A I did --

18 MS. JOHNSON: -- you can answer.

19 BY MS. BATEMAN:

20 Q And what were those obligations?

21 A I was under the understanding and it was
22 even written in my probationary -- that they were
23 supposed to meet with you at least quarterly and write
24 a paragraph.

25 And then we were supposed to talk about it

1 in documentation and both parties were supposed to
2 initial and confirm that we understood what was
3 happening and that if anything was the problem, we
4 would have a mature conversation and discuss it.

5 And if there were performance issues that
6 there would be conversations about performance issues
7 and a performance improvement plan or something of
8 that nature.

9 I did not think that anybody in the state
10 system -- because my mom's in the state system and my
11 father's in the state -- was in the state
12 system -- that if you were an employee, no one
13 outright fires you without warning and conversations
14 and documentation and some sort of parameters around a
15 procedure to do that.

16 You can't just blindside somebody a week
17 before they go permanent. Never having said a single
18 thing since Q1 and then just drop it on them.

19 Q So is it your testimony that not only did no
20 one talk to you about your performance deficiencies,
21 but you also never received anything in writing?

22 A Correct.

23 MS. BATEMAN: Okay. That's all I have.

24 MS. JOHNSON: All right. I think
25 that's all I have, but I do believe the court reporter

1 asked us to stay on at the end in case he had any
2 questions.

3 Court Reporter? I believe that's --

4 THE REPORTER: Yes. So --

5 MS. JOHNSON: -- what you said.

6 THE REPORTER: I just have a couple
7 things to do before we go off the record. So just
8 give me one second to make sure I have all the
9 exhibits down.

10 So if I'm not mistaken, there were 24
11 exhibits tendered today marked 1 through 8, then 10
12 through 13, and then 17 through 27, it appears. I
13 believe that's what I have down; does that match what
14 you have, Ms. Johnson?

15 MS. JOHNSON: I believe through 28; was
16 that not right?

17 THE REPORTER: Yeah. I do have it
18 through 28. Sorry. My bad.

19 MS. JOHNSON: Okay. Yeah. Yeah.
20 That's right, then.

21 THE REPORTER: All right. Next on the
22 list -- this one regards you, Ms. Bateman, and
23 Ms. Khazanie. How would -- like to handle signature;
24 we'd like to read and sign or waive?

25 MS. BATEMAN: Does that have to be on

1 the record?

2 THE REPORTER: Veritext wants me to
3 make sure I get it on the record whether it's required
4 or not saying what you --

5 MS. BATEMAN: Okay. I haven't -- yeah.
6 We will read and sign.

7 THE REPORTER: All right. And lastly,
8 how would we like to handle transcript orders?

9 MS. BATEMAN: Pardon me?

10 THE REPORTER: How would we like to
11 handle transcript orders? Veritext also likes us to
12 have those on the record too so we know what --

13 MS. BATEMAN: Yeah. I will confer with
14 my client and get back to you about that.

15 THE REPORTER: All right.

16 MS. JOHNSON: And, Joshua, I always
17 just say this. I just want the regular -- whatever
18 your regular is. I don't think it needs to be
19 expedited.

20 THE REPORTER: Okay.

21 MS. JOHNSON: So whatever your
22 regular -- which, I guess, is usually electronic. I
23 don't know what -- whatever your regular is. And if
24 you need more clarification than that, please just
25 contact me early next week.

1 THE REPORTER: All right. I don't
2 believe anyone else needs one. Then in that case,
3 I'll double-check --

4 MS. JOHNSON: Yeah, no one
5 else -- yeah. No one else of the other attorneys on
6 the defendants' side needs one.

7 MS. BATEMAN: Yeah. And can you just
8 send me the options, please?

9 THE REPORTER: All right. I'll have
10 someone from Veritext send you the options,
11 Ms. Bateman.

12 MS. BATEMAN: That'd be great. Thank
13 you.

14 THE REPORTER: All right. So with this
15 in mind, the time is now 5:24 p.m.; we are now off the
16 record.

17 (Signature reserved.)

18 (Whereupon, at 5:24 p.m., the
19 proceeding was concluded.)
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21
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23
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25

CERTIFICATE OF DEPOSITION OFFICER

I, JOSHUA SEAGONDOLLAR, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



JOSHUA SEAGONDOLLAR

Notary Public in and for the
State of North Carolina

☒ [X] Review of the transcript was requested.

CERTIFICATE OF TRANSCRIBER

I, KATLIN JENSEN, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



KATLIN JENSEN